

41
KSD007246846

RCRA



551108

RCRA

PART B

APPLICATION

for

Reid Supply Company

Wichita, KS

to the

EPA REGION VII ADMINISTRATOR

by

David G. Trombold

3/27/83

EPA-ARWM/PMTS

MAR 30 1983

Region VII K.C., MO

TABLE OF CONTENTS

<u>Number</u>	<u>Item</u>
1	General Facility Description
2	Topographic Map
3	Facility Location Information
4	Traffic Patterns
5	Chemical and Physical Analyses
6	Waste Analysis Plan
7	Containers
8	Tanks
9	Security Procedures
10	Inspection Schedule and Log Sheets
11	Preparedness and Prevention Requirements
12	Preventive Procedures
13	Requirements for Ignitable Waste
14	Contingency Plan and Emergency Procedures
15	Personnel Training
16	Closure Plans
17	Notice to Local Land Authority
18	Notice in Deed to Property
19	Closure Cost Estimate and Financial Assurance Document
20	Post-Closure Cost Estimate
21	Liability Insurance Policy
22	Proof of Coverage by State Financial Mechanism
23	Manifest System, Record Keeping, and Reporting
24	Engineer Certification

FIGURES

Number

1	Copy of Geological Survey Map
2	Aerial Photograph
3	Facility Map
4	City of Wichita Department of Engineering Letter
5	Flood Hazard Map
6	Traffic Pattern Map
7	Boiling Point and pH Determination
8	Private Laboratory Analysis
9	Analysis Provided by Customer
10	Analysis by a Disposal Facility
11	Customer Hazardous Waste Survey
12	Criteria for Determining Type of Analysis
13	Hazardous Waste Label
14	Flammable Liquid Label
15	Drum Storage Containment
16	4500 Gallon Storage Tanks
17	Settling Tank
18	Filter, Crude Processing, and Still feed Tanks
19	Chlorinated Solvent Storage Tank
20	Chlorinated Still Feed Tank
21	4000 Gallon Transfer Tank
22	1200 Gallon Transfer Tank

FIGURES (continued)

Number

23	Evacuation Routes
24	Inspection Schedule
25	Daily Inspection Log Sheet
26	Weekly Inspection Log Sheet
27	Monthly Inspection Log Sheet
28	Annual Inspection Log Sheet
29	Personnel Training Log
30	Personnel Training Log For Emergency Coordinator and Back Up Emergency Coordinator
31	Closure Letter of Credit
32	Certificate of Insurance

TABLES

Number

- | | |
|---|--|
| 1 | Wastes, Associated Hazards, and Basis for Hazard Description |
| 2 | Parameters and Rationale for their Selection |
| 3 | Parameters and Test Methods |
| 4 | Tank Dimensions and Capacities |


1. GENERAL DESCRIPTION OF THE FACILITY
122.25 (a)(1)

Reid Supply Company has been a supplier of industrial chemicals and laundry and dry cleaning supplies for 50 years. In the last seven years Reid Supply has moved into the area of reclaiming waste solvents in order to better serve our customers by both saving them money in solvent costs and providing them with an outlet for their hazardous waste solvent. Reid Supply only stores and transports the hazardous waste it acquires from customers. Waste solvents and potentially spent electroplating baths and sludges are stored in drums or tanks and reclaimed or transported to another TSD facility for disposal.

The plant of Reid Supply Company where the reclaiming operation is located is on the north central side of Wichita just off of 21st Street and I-135. This area is a heavy industrial area including Derby Refinery to the south and Missouri Pacific to the north of the facility.

Provided is a copy of the latest Part A application submitted November 5, 1982.

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F K S D 0 0 7 2 4 6 8 4 6			
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS			
I. EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.			
III. FACILITY NAME							
V. FACILITY MAILING ADDRESS							
VI. FACILITY LOCATION							
II. POLLUTANT CHARACTERISTICS							
INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.							
SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS			
		YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)			X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)			X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)			X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)			X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		
III. NAME OF FACILITY							
1 SKIP		REID SUPPLY COMPANY					
IV. FACILITY CONTACT							
A. NAME & TITLE (last, first, & title)			B. PHONE (area code & no.)				
2 TROMBOLD, CHUCK, PROCESS. ENGR.			3 1 6 2 6 7 5 7 4 2				
V. FACILITY MAILING ADDRESS							
A. STREET OR P.O. BOX							
3 P.O. BOX 11365							
B. CITY OR TOWN							
4 WICHITA							
C. STATE							
K S							
D. ZIP CODE							
6 7 2 0 2							
VI. FACILITY LOCATION							
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER							
5 2549 N. NEW YORK							
B. COUNTY NAME							
S. EDG WICK							
C. CITY OR TOWN							
6 WICHITA							
D. STATE							
K S							
E. ZIP CODE							
6 7 2 1 9							
F. COUNTY CODE (if known)							
S. C.							

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER												
F	K	S	D	0	0	7	2	4	6	8	4	6

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)
23	24 - 29

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

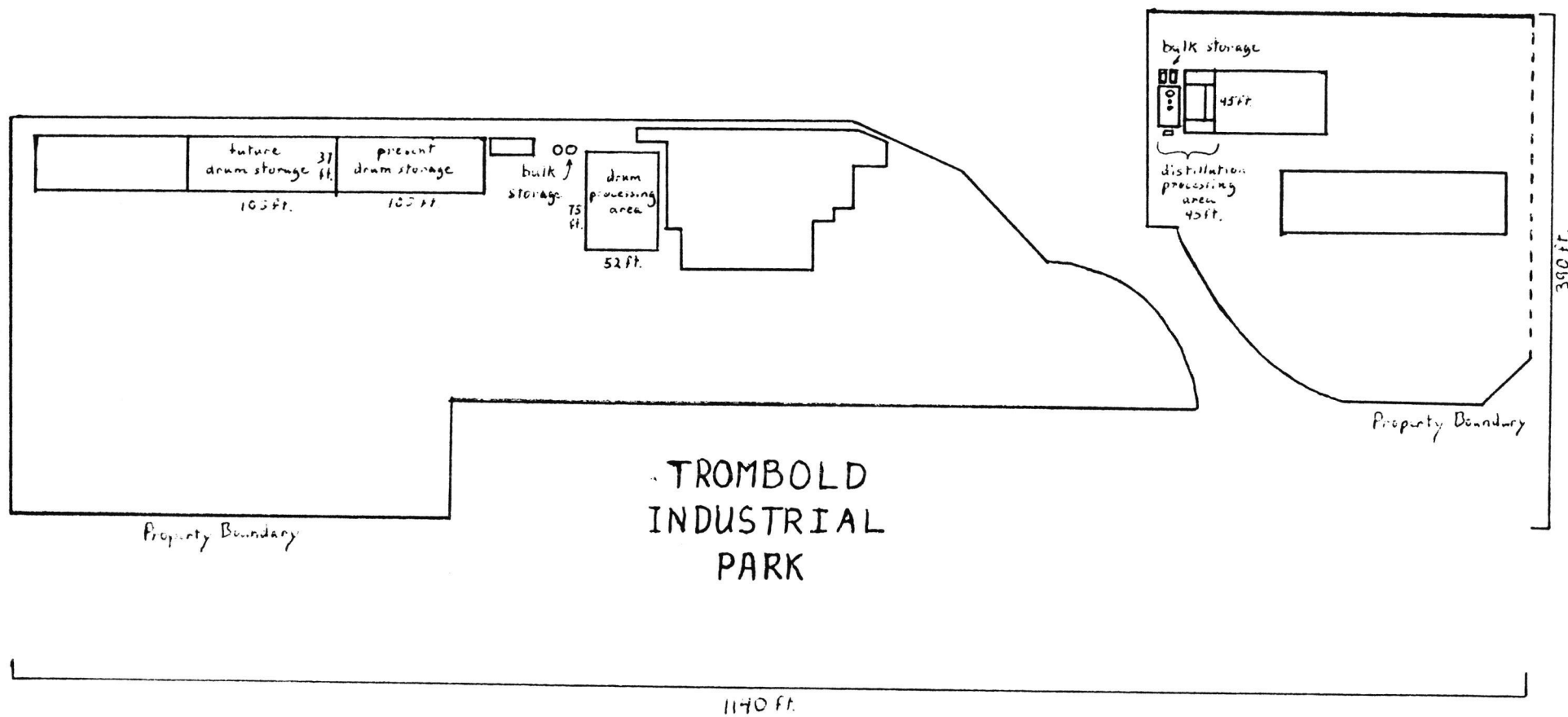
DUP																	
T/A C																	
1 2 13 14 15																	
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY						FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)			2. UNIT OF MEA- SURE (enter code)						1. AMOUNT			2. UNIT OF MEA- SURE (enter code)			
X-1	S 0 2	600			G				5								
X-2	T 0 3	20			E				6								
1	S 0 1	27500							7								
2	S 0 2	12500							8								
3									9								
4									10								

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
S W K S D 0 0 7 2 4 6 8 4 6 T/A C 1 1 2 13 14 15													S W DUP T/A C 2 DUP 1 2 13 14 15 23 26														
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																											
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																							
				1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))															
				23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46
1	F 0 0 1	330,000	P														S 0 1	S 0 2									
2	F 0 0 2	330,000	P														S 0 1	S 0 2									
3	F 0 0 3	55,000	P														S 0 1	S 0 2									
4	F 0 0 5	55,000	P														S 0 1	S 0 2									
5	D 0 0 1	660,000	P														S 0 1	S 0 2									
6	F 0 0 7	13,750	P														S 0 1	S 0 2									
7	F 0 0 8	13,750	P														S 0 1	S 0 2									
8																											
9																											
10																											
11																											
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24																											
25																											
26																											



REID SUPPLY CO. NORTH PLANT



120 feet
1 inch
Scale: 1 inch = 120 feet

N 97°20' E

37°44'51"

Scale:

1 in. = 1 mi.

from:
Wichita East Quadrangle
Kansas - Sedgwick Co.
7.5 Minute Series
(Topographic)

W I C H I T A

1316

132

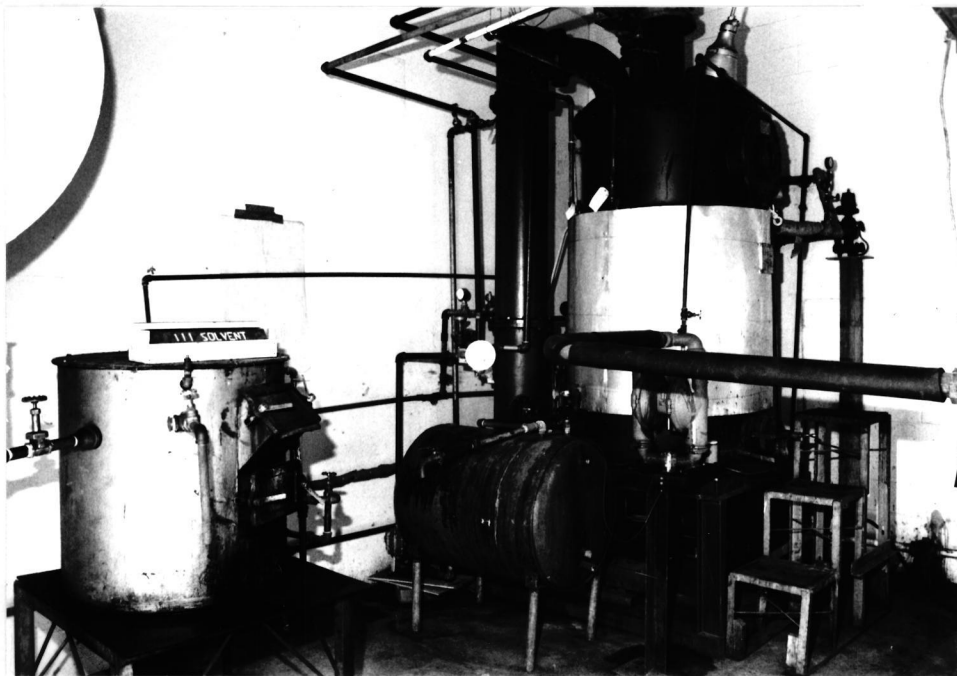
ROCK ISLAND

4

REID
SUPPLY
CO. Stream

Drummed Bulk
Storage

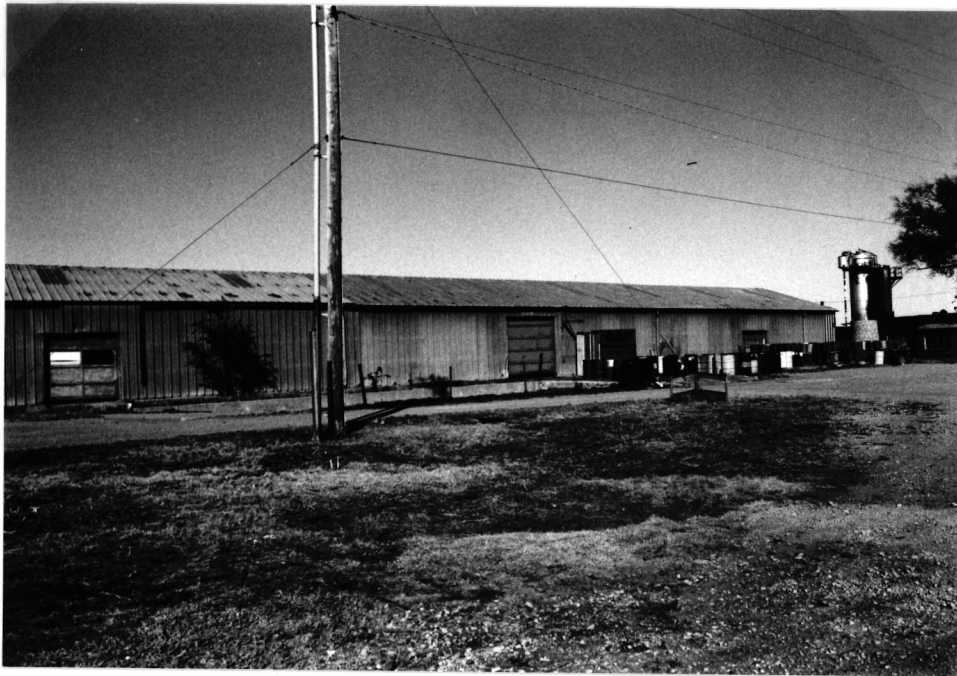
recycling
area



STILL AREA



PROCESSING AREA



DRUM STORAGE AREA



DRUM PROCESSING AREA

2. TOPOGRAPHIC MAP 122.25 (a)(19)

The only topographic map available for the area including Reid Supply Company is the United States Department of the Interior Geological Survey Map of the Wichita East Quadrangle. Contours are shown on the map in five foot intervals but they do not give any idea of the relief of the area on and around the facility, because the relief is flatter than the contours can describe (Figure 1).

The Wichita City Department of Engineering does not have a topographical map with two foot contour intervals. However, in order to show how the water flows from the facility, an aerial photograph (Figure 2) has been provided to show the water flow away from the facility. In addition the aerial photograph will show the 100 year floodplain area, surface waters, surrounding land uses, legal boundaries of the facility, buildings, and storage sites for hazardous waste. The wind rose, access control, buildings, storage sites, and operation sites are shown in detail on the supplemental map of the facility (Figure 3). The facility does not have any on-site injection or withdrawal wells nor are there any water wells within 1000 feet of the property according to available well listings from the K.D.H.E. Division of Environment and the Kansas Geological Survey Geophydrology Section.

6559 IV SE
(VALLEY CENTER) 649

1 mile

17'30" | 2 350 000

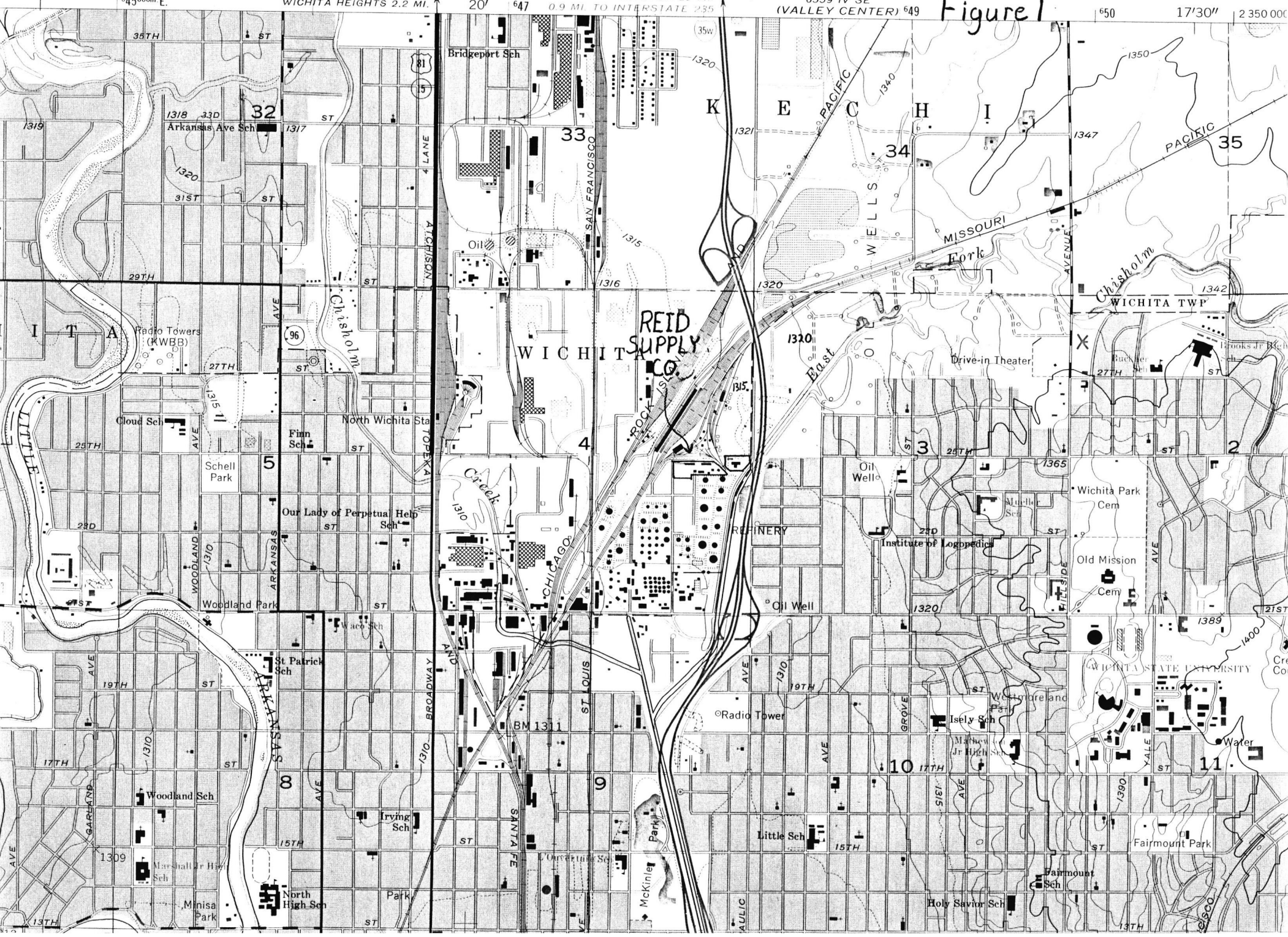


Figure 2



Figure 3

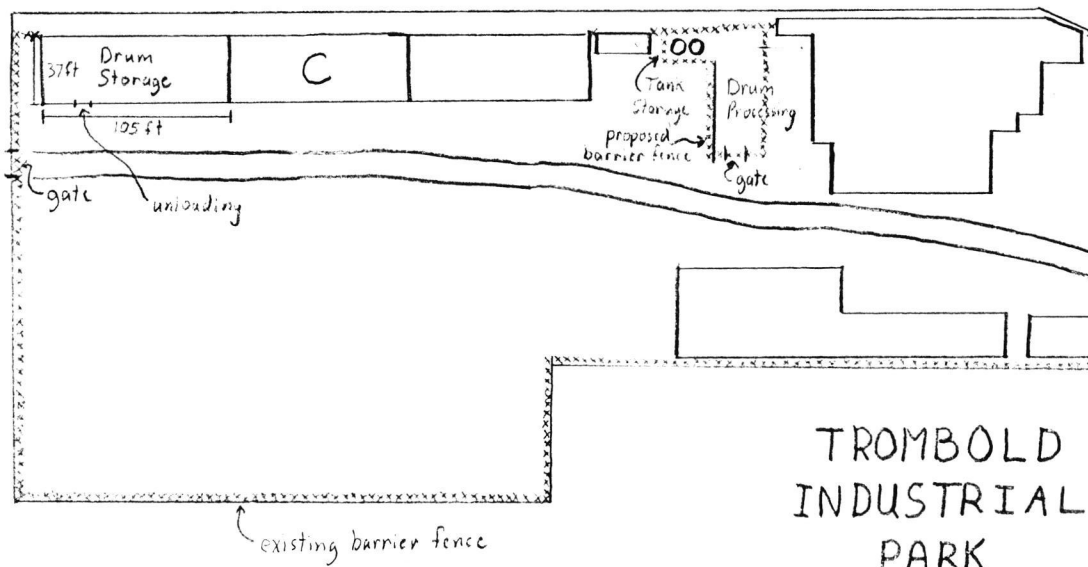
FACILITY MAP



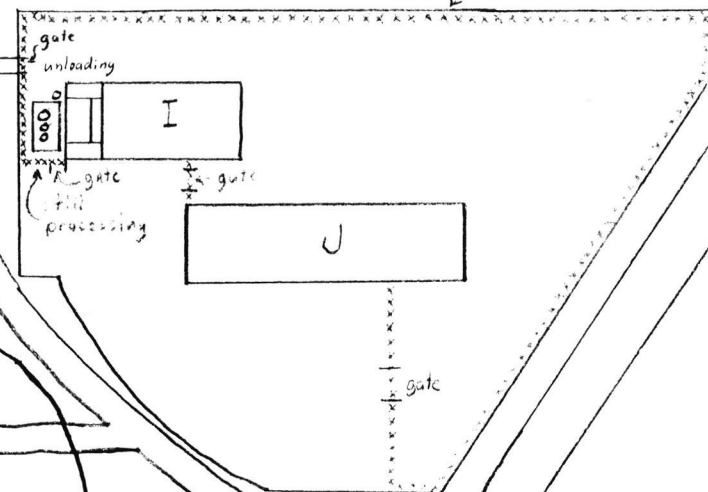
To Missouri
Pacific

REID
SUPPLY CO.
PLANT

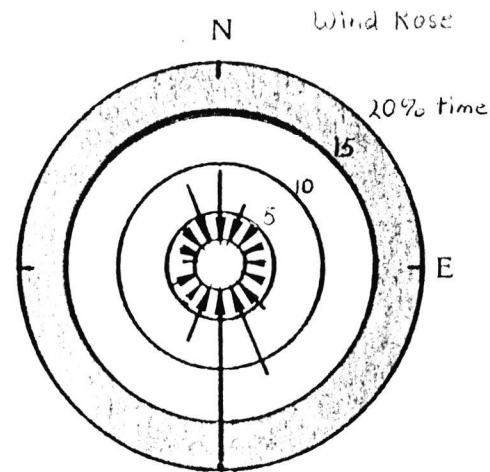
existing barrier fence



TROMBOLD
INDUSTRIAL
PARK



New York Ave.



Wichita

120 feet
1 inch

3. FACILITY LOCATION INFORMATION 122.25(a)(11)
and 264.18(a)(b) and Appendix VI (Part 264)

Seismic Standard. This does not apply because Reid Supply is not located within a political jurisdiction in which there is significant seismic activity.

Floodplain Standard. The Reid Supply Plant does not lie within a 100 year floodplain. Refer to the letter from the City of Wichita Department of Engineering (Figure 4) and the Flood Hazard Map (Figure 5). Therefore, the floodplain requirements do not apply.

THE CITY OF

Figure 4



DEPARTMENT OF ENGINEERING
CITY HALL — SEVENTH FLOOR
455 NORTH MAIN STREET
WICHITA, KANSAS 67202
(316) 268-4501

March 4, 1983

Mr. David Trombold
The Reid Supply Company
Sales & Service
911 E. Indianapolis
Wichita, KS 67211

Dear Mr. Trombold:

The property of 2549 New York is shown not to be within a special flood hazard area as indicated by Map Panel Number 06, Flood Hazard Boundary Map for Wichita, Kansas.

If you have any further questions, please don't hesitate to contact me at 268-4235.

Sincerely,

Chris J. Breitenstein, P.E.
Drainage & Flood Control Engineer

/ms

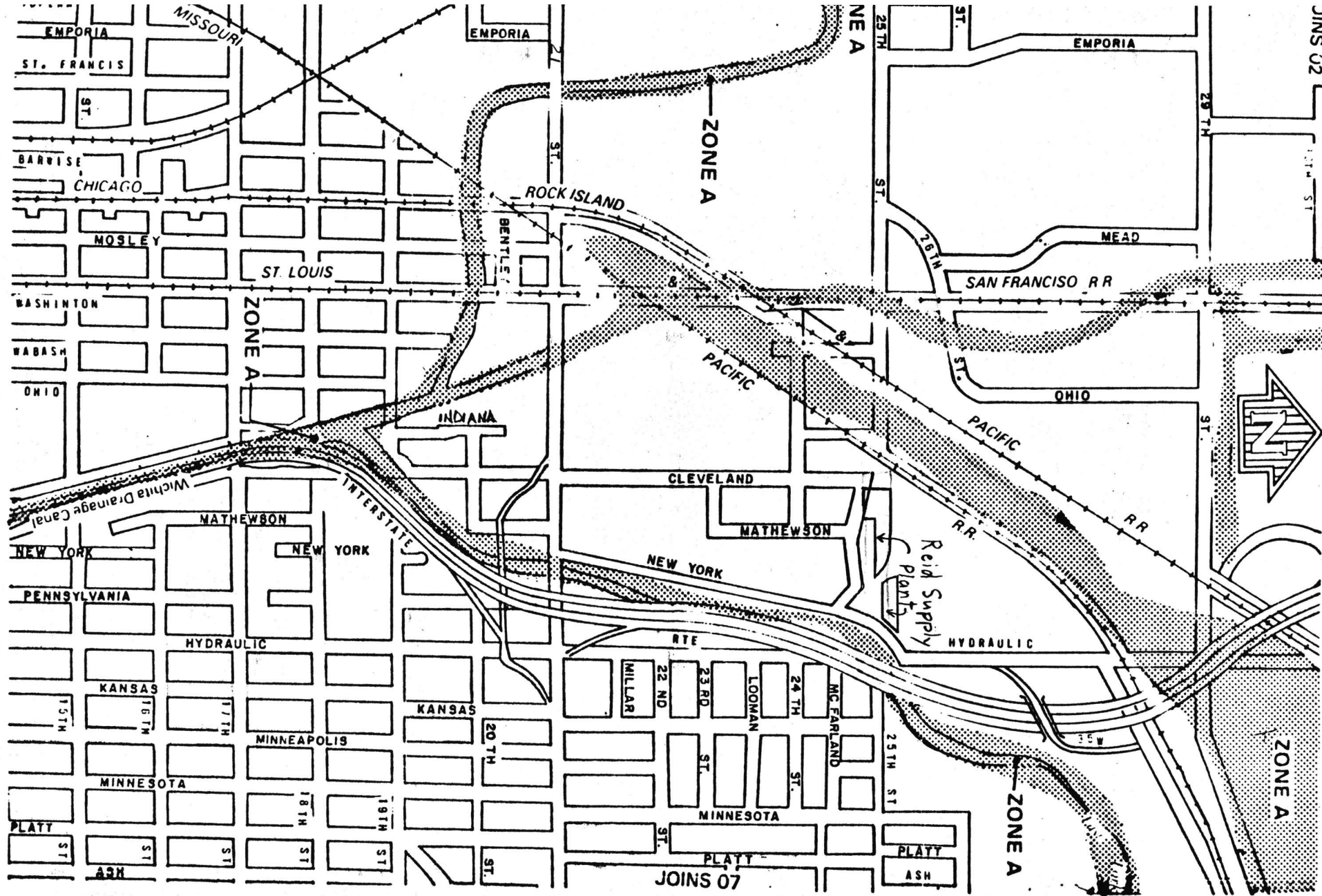


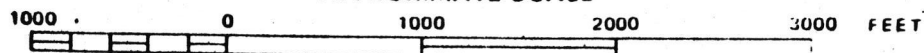
Figure 5

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Federal Insurance Administration

CITY OF WICHITA, KS
(SEDGWICK CO.)

APPROXIMATE SCALE



FLOOD HAZARD BOUNDARY MAP

MAP REVISED:
4/1/77

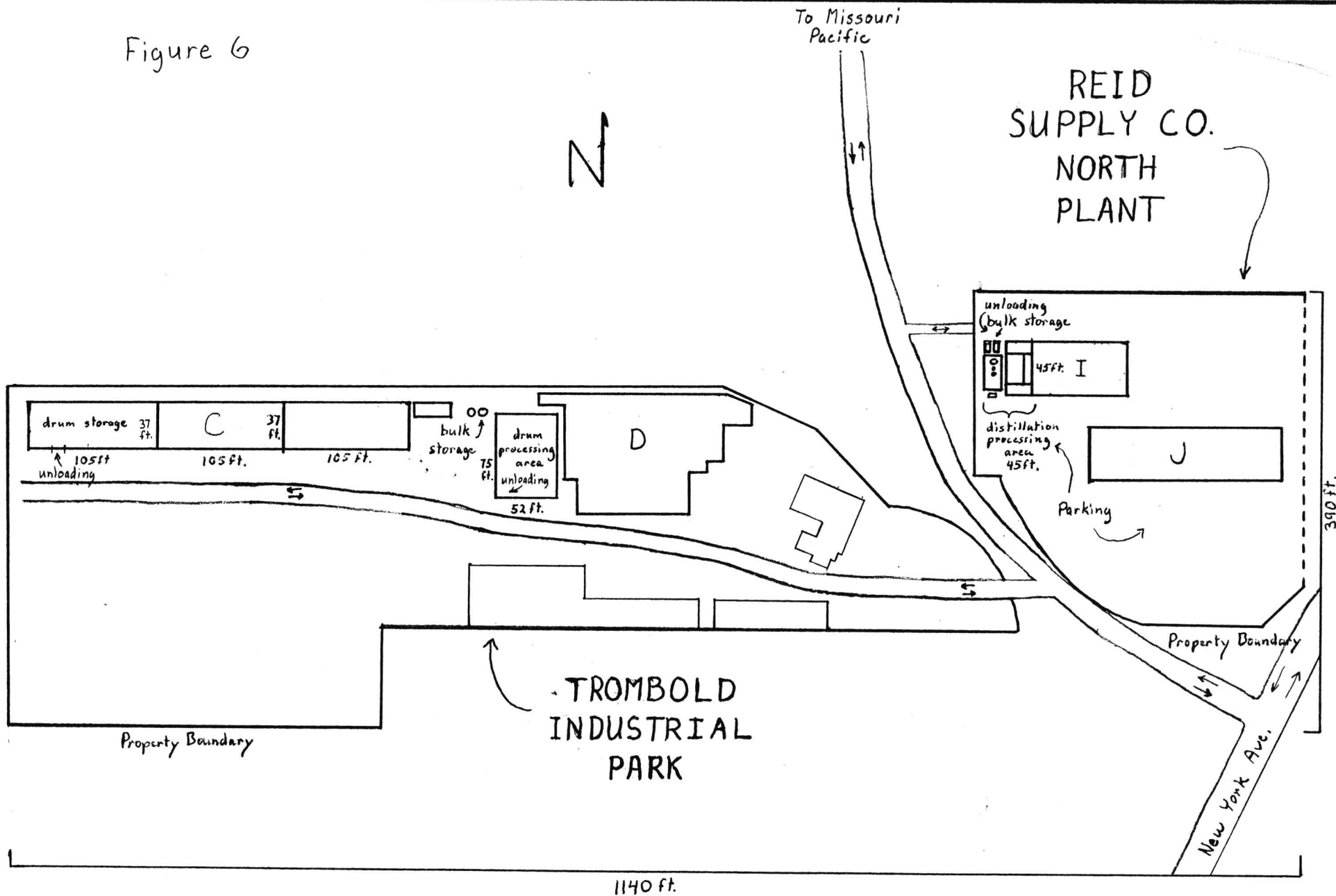
4. TRAFFIC PATTERNS 122.25(a)(b)

Access to the Reid Supply Plant is from Interstate 135, west on 21st Street to New York Avenue, right at New York, and left after about one quarter of a mile from the intersection. The main road that passes between the Reid Supply property to the right and Trombold Industrial Park to the left is two way (Figure 6). The only traffic on this road other than Reid Supply traffic is an occasional vehicle going to and from the Missouri Pacific property to the north. Figure 6 shows the on-site traffic pattern between Reid Supply which is the location of the recycling still process area and Trombold Industrial Park which is the location of the drum storage, drum processing, and tank storage areas. The only other significant flow of traffic occurs on the road that passes east and west through the center of Trombold Industrial Park.

The vehicle traffic to the drum storage, drum processing and tank storage areas will be one of three vans which have capacities of 30,000, 30,000, and 48,000 pounds transporting drums of waste solvent twice each week. A three quarter ton pick up truck will make approximately three trips daily to these areas.

The road surface of New York Avenue is concrete. The road surface of the road passing between the Reid Supply Plant and Trombold Industrial Park is asphalt. The road surface of the road running east and west to the drum storage, drum processing, and tank storage is gravel. Each is adequate to support the weight of the traffic.

Figure 6



5. CHEMICAL AND PHYSICAL ANALYSES
264.13(a) & 122.25(a)(2)

In order to demonstrate that the analyses performed on the hazardous waste coming to the facility are sufficient to insure proper storage of these, the following information is provided. Hazardous wastes are stored at this facility in 55 gallon drum containers, one 600 gallon storage tank and, two 4500 gallon storage tanks. The two storage tanks contain waste lacquer, enamel thinner or acetone having EPA hazardous waste numbers F003, F005, and D001. The 55 gallon drums contain the following:

	EPA Hazardous Waste #
Waste lacquer and enamel thinner	(F003, F005, D001)
Waste tetrachloroethylene, trichloroethylene methylene chloride, 1,1,1,-trichloroethane the sludges from the recovery of these	(F001, F002)
Waste xylene and acetone	(F003)
Waste methanol, toluene, methyl ethyl ketone	(F005)
Waste electroplating baths*	(F007)
Waste electroplating bath sludges*	(F008)

The waste lacquer and enamel thinners are ignitable because the components of these blends have flashpoints below 140°F. The waste chlorinated solvents are listed as hazardous waste because of their toxicity. The waste xylene, acetone, methanol, toluene, and methyl ethyl ketone are ignitable because they have flashpoints below 140°F. The waste electroplating baths and their sludges are listed as hazardous waste because of their toxicity due to cyanide content.

*These are not being stored at present but may be stored in the future.

Table 1 lists the hazardous wastes stored at the Reid Supply facility, their associated classification, and the basis for the hazard classification. In most cases the classification is based on known characteristics of the wastes, such as ignitability or E.P. toxicity analyses. For listed wastes, the classification is based on the listing.

Since Reid Supply Company is an off-site facility with at least 64 different wastestreams during the year of 1982, a waste analysis form will not be provided for each wastestream. Instead representative analysis forms will be provided for a simple boiling point and pH determination (Figure 7), a quantitative and qualitative analysis by a private laboratory (Figure 8), an analysis provided by a customer (Figure 9), and an analysis provided by a disposal facility (Figure 10). At least one of these analyses will be performed on each wastestream. The rationale for the use of which analysis is provided later in the Waste Analysis Plan.

To supplement the waste analysis is the Customer Hazardous Waste Survey (Figure 11). This form is to be completed for each wastestream of the customer in order to specifically identify the waste and additional toxic substances which it might contain. The analyses and survey provided will insure that the materials stored at Reid Supply Company are compatible with the steel drum containers and tanks and are identified according to their ignitability and toxicity for safe handling.

TABLE 1

Wastes, Associated Hazards, and Basis for Hazard Description

Waste	Hazard	Basis for Hazard Designation
Tanks		
Lacquer thinner	Ignitable	Flashpoint below 140°F
Enamel thinner	Ignitable	Flashpoint below 140°F
Drums		
Lacquer thinner	Ignitable	Flashpoint below 140°F
Enamel Thinner	Ignitable	Flashpoint below 140°F
Xylene	Ignitable	Flashpoint below 140°F
Methyl Ethyl Ketone	Ignitable	Flashpoint below 140°F
Acetone	Ignitable	Flashpoint below 140°F
Toluene	Ignitable	Flashpoint below 140°F
Methanol	Ignitable	Flashpoint below 140°F
Tetrachloroethylene	Toxic	Listed waste F001 or F002
Methylene Chloride	Toxic	Listed waste F001 or F002
Trichloroethylene	Toxic	Listed waste F001 or F002
1,1,1 - Trichloroethane	Toxic	Listed waste F001 or F002
Electroplating Baths	Toxic	Listed waste F007, EP Toxic contains sodium cyanide
Electroplating Bath Sludges	Toxic	Listed waste F007, EP toxic contains sodium cyanide

FEED SAMPLE ANALYSIS (CRUDE FEED)

DATE 7/5/82
 MANUFACTURER FIBER GLASS ENGINEERING
 SHIPMENT 42 DR.
 PROCESS ACETONE

ANALYSIS

1. SPECIFIC GRAVITY:
2. COLOR: LGT. ORANGE
3. pH: 7.0
4. BOILING POINT RANGE TEST: 50 ML. SAMPLE

ML.	T=°F	% INTERVAL	VOL. % DISTILLED	ΔT
I.B. PT.	27°C : 81°F	—	—	—
1st DROPS	57°C : 135°	0-5%	10.0%	54°F
10	58°C : 137°	5-10%	20.0	2°
20	59°C : 139°	10-20%	40.0	2°
30	60°C : 140°	20-30	60.0	1°
40	63°C : 145°	30-40	80.0	5°
43	66°C : 151°	40-43	86.0	6°
46				
47				
48				
49				
50				
DRY PT.	66°C : 151°			

REMARKS:

86.0 % SOLVENT: 86.0% ACETONE
14.0 % SOLIDS: 14.0% RESIN, TRACES H₂O
100.0%

ACCEPTANCE:

Means Laboratories, Inc.

Figure 8



ANALYTICAL & CONSULTING CHEMISTS

419 N. HANDLEY • BOX 2012 • TELEPHONE 262-4407

Wichita, Kansas 67203

TO: Reid Supply
911 E. Indianapolis
Wichita, Kansas 67211

DATE: February 14, 1983

LAB. NO.: 16217

Date Submitted: January 31, 1983

Sample Submitted: 1 sample solvent

ANALYSIS

<u>Compound</u>	<u>(v/v) %</u>
Acetone	3
MEK	9
Toluene	33
Xylene	2
Chloroform	16
Trichloroethylene	21.0
Heavy Ends	3.5
Water	0.2
Unknown	12.3

DISTILLATION ASTM D-86

<u>Volume</u>	<u>° F</u>
IBP	58
10	218
20	238
30	248
40	258
50	270
60	284
70	310
80	331
90	352
End Point	384

Respectfully submitted,

Means Laboratories, Inc.

Randall Fornshell
Randall Fornshell

WASTE SOLVENT STILL ... TECHNOLOGY

WASTE SOLVENT RECOVERY LABORATORY REPORT

1 of 3

Customer Cessna Aircraft CompanyDate June 8, 1981 Initials CKC Test Request No. 378Sample Waste Paint & Solvent Material Sample Log No. 1234

A. Solids Test

A 5 ml quantity of your representative solvent sample was weighed, then dried at 300°F for one hour. The solid non-volatile contaminate that remained after drying was weighed again. From these two weights, a solids content can be determined.

1. Tare (vessel) weight..... 22.75 grams2. Gross weight of sample solvent..... 29.51 grams3. Gross weight of dried residue..... 23.21 grams4. $\frac{\text{Net weight of dried residue}}{\text{Net weight of sample solvent}} = \frac{.46 \text{ grams}}{6.76 \text{ grams}} = \underline{7} \% \text{ solids}$ 5. 100% minus 7 % solids = 93 % total reclaimable solvent (by wt.)

B. Distillation Test

A representative sample was distilled to a point of thick boiling liquid. (Residue is drainable) The distillate was collected, analyzed, and the results are as follows:

Sample test size 500 ml Color YellowViscosity 15 sec., #2 Zahn CupTare (vessel) weight 260.1 gramsGross weight of solvent sample 667.0 gramsGross weight of residue 301.3 grams

Inhibitor required _____

Remarks _____

#F-79-106

C. Calculation of Solvent RecoveryStep 1 (Data from Section B)

$$\div \frac{41.2 \text{ grams (net weight of residue)}}{406.9 \text{ grams (net weight of solvent sample)}} = \underline{10} \% \text{ residue (by wt.)}$$

Step 2

$$100\% \text{ minus } \underline{10} \% \text{ residue} = \underline{90} \% \text{ solvent reclaimed by weight)}$$

Step 3

$$\div \frac{90 \% \text{ (solvent reclaimed)}}{93 \% \text{ (reclaimable solvent [Section A])}} = \underline{97} \% \text{ solvent reclaimed by weight}$$

D. Gas Chromatograph Analysis

A small representative sample (ul) of the distillate was injected into a gas chromatograph column. The final output on the graph paper is a record of the solvents and their relative percent composition of the distillate.

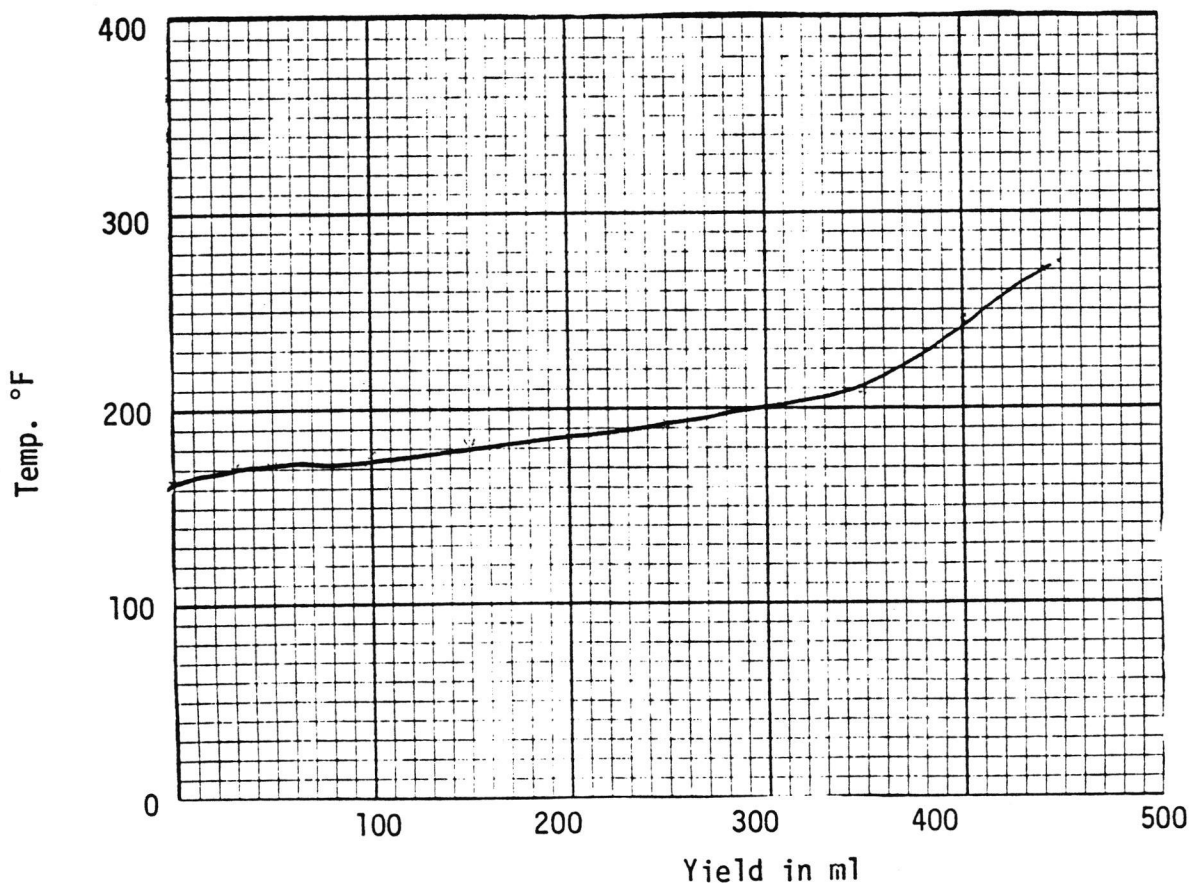
Distillation Results

3 of 3

Heat Setting: 65

Clock Time	Vapor Temp. °F		Distillate Vol. %		Remarks
	°C	°F			
8:25					Start
8:36					First sign of boiling
8:38	75	164	1st cond.		Smooth boil
8:43	77	170	30 ml		Clear cond., smooth boil
8:46	77	170	50 ml	10%	" "
8:54	79	174	100 ml	20%	" "
9:00	82	180	150 ml	30%	" "
9:05	83	184	200 ml	40%	" "
9:13	88	190	250 ml	50%	" "
9:18	91	196	300 ml	60%	" "
9:27	98	208	350 ml	70%	" "
9:40	118	246	400 ml	80%	" "
9:59	134	272	450 ml	90%	" "

90 % reclaimed solvent



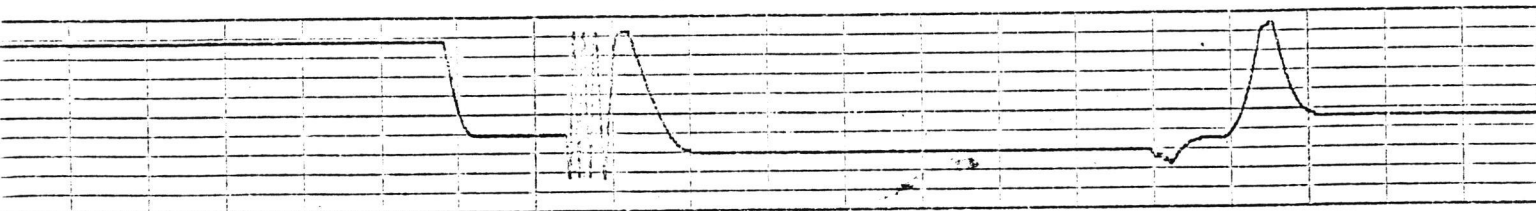
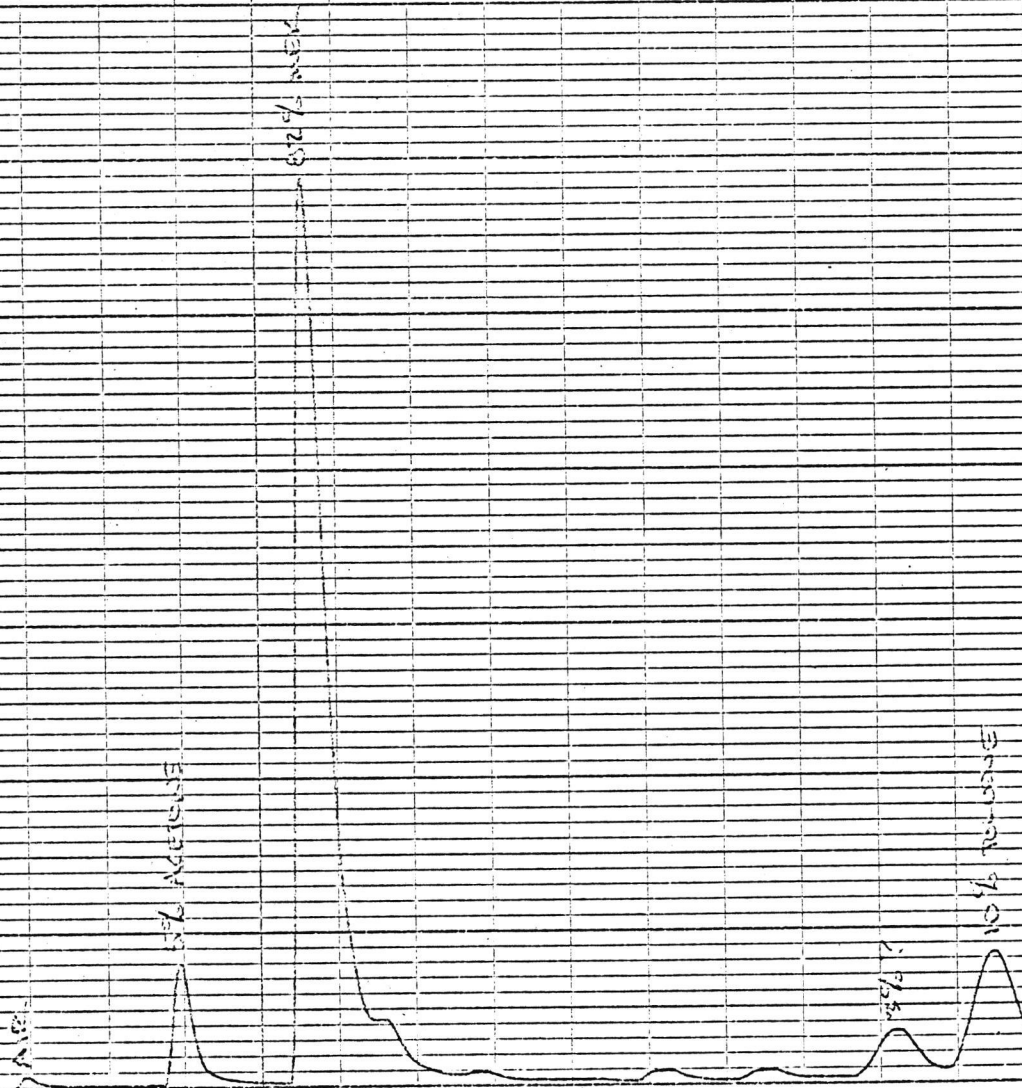
Residue (M.S.L. No. 1236) Flowable when warm, very slow when cold

Distillate (M.S.L. No. 1235) Clear

STD AT 100°C

Cross Section C

Distance 11255





Plating baths

WASTE PROFILE SHEET CODE

WPS No. E83-0093

Figure 10

LONE MT.

LAB NO.

WASTE ANALYSIS REPORT

CLIENT	NAME	<u>Kansas Plating Inc.</u>	NAME	<u>Freeze Out Sludge</u>	
	ADDRESS	<u>Wichita KS</u>	DOOR	<u>slight</u>	
PROFILE SHEET RECEIVED	<u>2/14</u>	REPRESENTATIVE SAMPLE RECEIVED	<u>2/14</u>	COLOR	<u>clear</u>
CERTIFICATE OF REP. SAMPLE RECEIVED		SAMPLE TAKEN		PHYSICAL STATE	<input type="checkbox"/> Liquid <input type="checkbox"/> Solid <input checked="" type="checkbox"/> Sludge <u>wet crystals</u>
PROPOSED TREATMENT/DISPOSAL FACILITY				DATE SAMPLED	DATE RECEIVED

THE ANALYSES BELOW REPORTED WERE SELECTED BY ME, BASED UPON THE GENERATOR'S REPRESENTATIONS IN THE PROFILE SHEET AND ANY APPLICABLE WASTE ANALYSIS PLAN ESTABLISHED BY THE PROPOSED FACILITY FOR WASTE OF THIS TYPE, ANALYSES REQUIRED BY A WASTE ANALYSIS PLAN ARE INDICATED BY AN ASTERISK (*).

Date of Analysis 2/2/83

Analyst T. Spedding

TEST		TEST	
Specific Gravity	<u>0.79</u>	Fluorides, as F, mg/l	
pH <u>2.2g/25ml</u>	<u>11.6</u>	Nitrate, as NO ₃ , mg/l	
Normality	<u>0.4</u>	Nitrite as NO ₂ , mg/l	
		Phosphate, as P, mg/l	
COD, mg/l		Sulfate, as SO ₄ , mg/l	
BOD, mg/l		Sulfides as S, mg/l	<u>Neg</u>
Total Solids * 105°C		Sulfur mg/l	
Total Dissolved Solids, mg/l		Phenols, mg/l	
Total Suspended Solids, mg/l		Cyanides, as CN, Total, mg/l <u>23.3</u>	<u>6250. mg/g</u>
% Solids	<u>38.</u>	Cyanides, as CN, Free, mg/l	
Moisture Content %			
TLV Sniffer	<u><20</u>	Nitrogen, Ammonia as N, mg/l	
Flash Point, F°	<u>>140.</u>	Nitrogen, Organic, as N, mg/l	
Ash Content, on Ignition		Total Kjeldahl Nitrogen, as N, mg/l	
Heating Value, BTU/lb			
Heating Value, BTU/Gal.		Total Alkalinity (P), as CaCO ₃ , mg/l	
Arsenic, as AS, mg/l		Total Alkalinity (M), as CaCO ₃ , mg/l	
Barium, as Ba, mg/l		Total Hardness, as CaCO ₃ , mg/l	
Boron, as B, mg/l	<u>5</u>	Calcium Hardness, as CaCO ₃ , mg/l	
Cadmium, as Cd, mg/l		Magnesium Hardness, as CaCO ₃ , mg/l	
Chromium, Total as Cr, mg/l			
Hexavalent Chromium * Cr, mg/l		Oil and Grease, mg/l	
Copper, as Cu, mg/l		Viscosity (cps)	
Iron, Total as Fe, mg/l		Corrosivity (mpy)	
Iron, dissolved, as Fe, mg/l	<u>✓</u>	Aldrin, mg/l	
Lead, as Pb, mg/l		Chlordane, mg/l	
Manganese, as Mn, mg/l		DDT's, mg/l	
Magnesium, as Mg, mg/l		Dieldrin, mg/l	
Mercury, as Hg, mg/l		Endrin, mg/l	
Nickel, as Ni, mg/l		Heptachlor, mg/l	
Selenium, as Se, mg/l		Lindane, mg/l	
Silver, as Ag, mg/l		Methoxychlor, mg/l	
Zinc, as Zn, mg/l		Toxaphene, mg/l	
Water Soluble	<u>HPS</u>	Parathion, mg/l	
Bicarbonates, as HCO ₃ , mg/l		2, 4, D, mg/l	
Carbonates, as Co ₃ , mg/l		2, 4, 5, TP (Silvex), mg/l	
Chlorides, Organic, as Cl, mg/l		PCB's, mg/l	
Chlorides, Inorganic, as Cl, mg/l			



Figure 11

The Reid Supply Company

911 E. Indianapolis
P. O. Box 11365
Wichita, Kansas 67202
267-1231
(AC 316)

950 Liberty Street
(at Union Avenue)
Kansas City, Mo. 64101
842-4440
(AC 816)

CUSTOMER HAZARDOUS WASTE SURVEY

Please fill in all of the information below.

E.P.A. I.D. NO. _____

GENERATOR _____

MAILING ADDRESS _____

STREET ADDRESS _____

CITY _____ STATE _____ ZIP _____

WASTE STREAM CLASSIFICATION (please check the categories which describe the wastestream best):

- | | |
|--|---|
| <input type="checkbox"/> VAPOR DEGREASING SOLVENT | <input type="checkbox"/> PAINT |
| <input type="checkbox"/> CHLORINATED HYDROCARBONS | <input type="checkbox"/> ELECTROPLATING BATH |
| <input type="checkbox"/> PAINT STRIPPING SOLVENT | <input type="checkbox"/> SLUDGES OF ELECTROPLATING BATH |
| <input type="checkbox"/> FLAMMABLE SOLVENTS & ORGANICS | <input type="checkbox"/> OTHER (PLEASE SPECIFY) |
| <input type="checkbox"/> PAINT WASH SOLVENT | _____ |

WASTESTREAM CHARACTERISTICS (please list the wastestreams, pH and approximate range of percent composition at 70°F for the listed characteristics)

Wastestream	pH	% Liquid	% Settleable Solids	% Slurry
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

Is wastestream pourable/pumpable? YES___ NO___

Do any of the wastestreams contain

- 1) Organic bound sulfur, chlorine, fluorine, bromine, iodine, nitrogen or phosphorus? YES___ NO___
- 2) Heavy metals such as lead, mercury, arsenic, barium, cadmium, selenium or silver? YES___ NO___
- 3) PCB's? YES___ NO___
- 4) Insecticides or herbicides? YES___ NO___
- 5) Other toxic substances? YES___ NO___

If any of the above are checked "YES" name the wastestream and list any of the above elements or chemicals.

Describe the process that generates the waste.

AVAILABILITY OF MATERIAL

One Time _____ Continuous _____

QUANTITY PER MONTH

Bulk Gallons _____ Number of Drums _____

WASTE SAMPLE

Provide a representative one pint minimum sample from each wastestream.

LABORATORY ANALYSIS

Attach a laboratory analysis of each wastestream which must include:

- 1) components
- 2) component precentages
- 3) water percentage
- 4) distillation range

ADDITIONAL INFORMATION

Please include additional information below that would be helpful in handling any of the above wastestreams in a safe and environmentally sound manner.

CERTIFICATION

The above information is true to the best of my knowledge.

Employee responsible for Hazardous
Waste

6. WASTE ANALYSIS PLAN
264.13(b),(c) and 122.25(a),(3)

Parameters and Rationale:

Table 2 shows the hazardous wastes stored at the facility, the analytical parameters that apply to each, and the rationale for selection of the parameters. Table 3 shows the test methods that are used to measure the analytical parameters.

In case of waste flammable and chlorinated solvents either a simple boiling point determination to confirm the customer's identification or a gas chromatograph identification of the wastestream allows the facility to determine the flashpoint for ignitable wastes or toxicity for chlorinated wastes in order to safely handle them. This identification also helps channel like wastestreams to be recycled or stored together. The following criteria (Figure 12) are used to determine whether a simple boiling point determination will be used for the wastestream analysis or a quantitative and qualitative analysis through the use of a gas chromatograph.

If the wastestream amounts to less than 2200 pounds per month only a boiling point determination will be used to verify the customer's identification of the wastestream provided by the customer Hazardous Waste survey (Figure 11). Since boiling point is a characteristic property of chemical substances, this will be a good check on the customer's identification. If, however, the boiling point does not confirm the customer's identification, a gas chromatograph will be performed on the wastestream to check its identification further. This approach was chosen because many of the 64 customers of the facility generate only small quantities of

TABLE 2
Parameters and Rationale for their Selection

Hazardous Waste	Parameter	Rationale
Lacquer Thinner	Boiling point determination or quantitative and qualitative analysis	The identification of the wastestream by the customer in the Customer Waste Survey will confirm or contradict the boiling point determination. A confirmed customer identification can be used to determine the flashpoint in order to handle the material safely. If the customer identification is contradicted by the boiling point, determination proper identification can be obtained and subsequent flashpoint determined from a quantitative and qualitative analysis. The material can be handled safely.
Enamel Thinner	"	"
Xylene	"	"
Methyl Ethyl Ketone	"	"
Acetone	"	"
Toluene	"	"
Methanol	"	"
Tetrachloroethylene	"	Upon identifying the waste-stream as a chlorinated solvent by confirming the customer's identification in the Customer Waste Survey with the boiling point determination or by a gas chromatograph analysis, the material can be treated safely as a toxic substance.
Methylene Chloride	"	"
Trichloroethylene	"	"
1, 1, 1-Trichloroethane	"	"

(continued)

Hazardous Waste	Parameter	Rationale
Electroplating Baths	EP Toxicity (cyanide)	This is expected for electroplating baths and their sludges.
Electroplating Bath Sludges	"	"

TABLE 3
Parameters and Test Methods

Parameter	Test Method	Reference
Boiling Point	Simple distillation and temperature profile	
Qualitative analysis	Gas chromatography	
Quantitative analysis	Gas chromatography	
Cyanide Toxicity	Cyanide determination by preliminary distillation	Standard Methods for the Examination of Water and Waste Water

Figure 12

Criteria for Determining Whether to Use Boiling Point Determination
or Quantitative and Qualitative Analysis

Waste Stream

less than 2200#/month

Analysis

Boiling point determination
(Does it confirm customer identification)

No

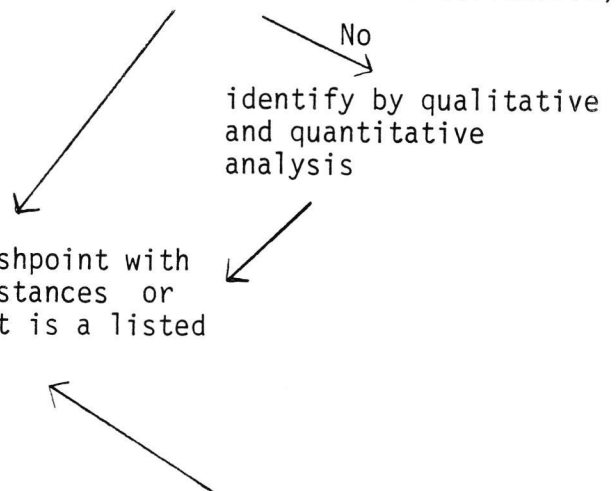
identify by qualitative
and quantitative
analysis

Yes

determine flashpoint with
ignitable substances or
toxicity if it is a listed
toxic waste

greater than 2200#/month

Identification of substance is either
confirmed or determined by qualitative
and quantitative analysis



hazardous waste solvent annually and the wastestream is very consistent due to the simplicity of the operation. It is therefore easy to insure the consistency of the wastestream. Boiling point determinations will be performed annually to insure the consistency of each wastestream from these small quantity generators.

However, if the wastestream amounts to more than 2200 pounds per month, a gas chromatograph will routinely be performed on each new shipment.

Customers are requested to inform the facility of any changes in their wastestream composition.

In the case of electroplating baths and their sludges an analysis will be performed on each wastestream before it is accepted by Reid Supply Company. This analysis will be performed by the disposal site or a private laboratory to determine the concentration of sodium cyanide.

Sampling Methods:

Before any new wastestream is received by Reid Supply Company, each salesman is required to obtain a representative, one pint, sample for suitable analysis. The sample must be okayed by the process engineer before the waste can be picked up. Sampling of waste solvents from drums or tanks is performed by a bottle attached to a long wire. This enables samples to be taken from the top, middle, and bottom of the container to insure a representative sample. Each sample container is labeled according to date, customer, and wastestream.

Electroplating bath samples are to be collected the same way as waste solvents, and the sample bottles are labeled accordingly. The sampling of the electroplating bath sludges is different only in that a sample from the bottom of the tank is obtained.

7. CONTAINERS 264.171, 264.172,
264.173, 264.175, 264.176, and 122.25(b) (1)

Condition of Containers:

The containers used for primary containment are DOT approved 17 E and 17 H steel drums. The containers are normally the ones provided by the customers. However, the drums provided by the facility are DOT approved, reconditioned drums. All drums from customers are labeled with EPA approved hazardous waste labels (Figure 13). If the contents are considered ignitable, a flammable liquid sticker (Figure 14) is placed beside the other label.

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the contents of the container will be transferred to a container in good condition or to one of the bulk storage tanks.

Compatibility of Waste with Containers:

The various types of hazardous wastes handled by Reid Supply as seen in the Chemical and Physical Analysis section (Table 1) are compatible with the steel 17 E and 17 H drums used by the facility for storage. The pH of the wastes is not a factor because it is not below 5 or above 9. The ability of the drum to contain the waste is not impaired.

Management of Containers:

In order to insure that drums holding hazardous waste are closed during storage, the drums are inspected weekly according to the inspection log. A forklift with a special drum handling attachment is used to move the drums so that drums are not damaged while handling. The drums are stored in a special area so they will not be damaged by movement of equip-

Figure 13

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY.

PROPER D.O.T.
SHIPPING NAME _____ UN OR NAH _____

GENERATOR INFORMATION:

NAME _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____

EPA _____

ID NO. _____ WASTE NO. _____

ACCOMPLISHED _____

QUANTITY _____ DOCUMENT NO. _____

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES



Figure 14

ment or other potentially damaging practices.

Inspections:

According to the inspection schedule the drum storage area will be inspected for open bungs, leaking containers, and for deterioration of containers and the containment systems.

Containment:

At present the drum storage area is not completed. Although it has a good concrete base and good roof and walls, the dikes and sump still need to be put in. The drum storage area located in C Building (Figure 3) is designed to be finished as follows (Figure 5):

The underlying base is an 18 inch slab of concrete which is free of cracks and gaps and is capable of containing leaks, and spills, until the collected material is detected and removed.

The containers are stored on pallets to protect them from contact with accumulated liquids since the surface is flat.

The containment system with the dimensions 100 feet x 36 feet x 4 inches gives a total capacity of 8910 gallons. The total volume of 300 steel drums is 16,500 gallons. Ten percent of this is 1650 gallons. The maximum displaced volume from 300 drums within the diked area is 2331 gallons. This leaves a volume of 3981 available to contain 1650 gallons of liquid. This is more than enough.

Run-on into the drum storage area is prevented since the galvanized steel warehouse provides shelter from any run-on.

Provisions have been made in the section on Contingency Plans and Emergency Procedures for removing spilled or leaked waste from the sump in a timely manner.

At present the facility has about 400 17 H drums that contain a minimal amount of free liquids. These drums are to be tested for free liquids. The ones containing free liquids will be stored on pallets inside the diked area. The rest of the drums will be stored outside the diked area on pallets to be kept from contact with standing liquids.

Drums are spaced in rows so that a person can easily walk between the two rows of drums for inspection. The drums containing free liquids are not stacked. The drums are segregated according to waste types with flammables together, chlorinated solvents together and in the future electroplating waste will be stored together.

Special Requirements for Ignitable Waste:

The drums in the drum storage area do contain ignitable but not reactive waste. C Building where the drum storage area is located is fifteen feet from the property line to the north and five feet from the property line to the west. This should not be a problem since to the north and west there are no buildings for at least 50 yards. Refer to the aerial photograph (Figure 2). Ideally a storage area at least 50 feet from the property line would be best, but considering the available building, the open space around it and the ability of the proposed dike to contain a severe spill, C Building is a workable alternative.

Special Requirements for Incompatible Waste:

The facility does not store incompatible wastes, therefore the

regulations in this area do not apply.

Closure:

At the time of closure the floor and sump will be scraped of all residue and the residue will be placed in a 17 H drum for disposal.

Containment System Design: (See Figure 15)

The drum storage area located in C Building, although the sump and dike are not built yet, will be 100 feet x 36 feet x 4 inches. The base is 18 inch thick concrete, the sump will be concrete, and the dike will be either brick or concrete laid on the concrete base.

The containers are kept from contact with standing liquids by being placed on pallets.

The capacity of the diked area will be 300 drums if they are not stacked. The volume capacity will be 6578 gallons allowing for the volume displaced by 300 drums.

Run-on will not occur in the diked area because of the shelter provided by the warehouse.

Accumulated liquids within the diked area can be analyzed by the waste analysis procedure provided in the section on The Waste Analysis Plan. The liquid can be removed by pumping the contents into 55 gallon 17 E drums for disposal or recycling.

At present Reid Supply Company has 400 drums of paint solids and still bottoms which will be disposed of by incineration in the next six to nine months. They have a minimum amount of liquid in them but the exact amount is undetermined since the drums were packed before the need for free liquid tests was known. Those that are found to contain free

liquids, which will be determined by the EPA approved test procedure of using filter paper and watching for liquid to seep through the papers, will be stored in the diked area. The rest will be stored outside the diked area in the drum storage area.

These drums outside the diked area will be stored inside the warehouse on pallets to keep them from contact with standing liquids.

As stated earlier in this section on Special Requirements for Ignitable Waste, the 50 foot buffer zone for the drum storage area is not possible with the existing building. However, considering that there are no buildings on the neighboring properties for at least 50 yards or more the possibility of harm to neighboring property is very small.

No special provisions are necessary for incompatible waste since there are no incompatible wastes at Reid Supply Company.

8. TANKS 264.191, 264.192, 264.194
264.197, 264.198, 264.199, 122.25 (b)(2)

Shell Thickness:

The two 4500 gallon storage tanks located near the drum processing area have shell thicknesses of .26 of an inch as determined by a sonic metal thickness meter. The smaller chlorinated storage tank, two transfer tanks, and processing tanks, have shell thicknesses not less than an eighth of an inch. All the tanks are vented to the atmosphere to assure that they do not collapse or rupture.

General Operating Requirements:

The cold steel tanks are compatible with the waste solvents that are contained by them. The pH of the waste solvents does not go below 5 or above 9. Therefore corrosion will not be a problem.

In order to prevent over filling of the two 4500 gallon storage tanks, level detectors will be installed that will trigger an alarm to alert the technician he has to turn off the pump. The settling tank, crude processing tank and still feed tank will be plumbed with overflow pipes that will dispense liquid back into the one hundred gallon filter tank when a maximum level of one foot from the top is reached in any of the tanks. The filter tank will be equipped with a level detection device which will sound an alarm when the level reaches six inches from the top. The 600 gallon chlorinated storage tank and the five hundred gallon chlorinated feed tank will each be plumbed with an overflow pipe that will each empty into a fifteen gallon drum.

Inspections:

According to the inspection schedule (Figure 24) overfilling control

equipment will be inspected once each operating day, construction materials of the storage and processing tanks will be inspected weekly for leaking or weakening, and the area immediately surrounding the tanks will be inspected weekly for signs of leakage. The inspection schedule provides for weekly inspection of the storage transfer and processing tanks and for annual inspection of the inside of the two storage tanks. The external inspection will check for cracks, or leaks that may lead to a serious release. The internal inspection will take place annually after the contents have been routinely removed. The man holes will be removed and with organic vapor masks worn the interior of the tanks will be examined with a spark proof flashlight for corrosion leading to future leakage.

Closure:

At closure the various tanks and piping will be steam cleaned and the water and residue will either be distilled to separate the residue for disposal or the entire volume of water and residue will be deep-well injected. The pumps will also be decontaminated by washing them in clean solvent. The dike areas will be scraped of all the residue. More details are provided in the section on Closure.

Special Requirements for Ignitable Wastes:

Reactive wastes are not handled by Reid Supply Company. However, the ignitable waste solvent is stored to protect it from ignition. This is provided by the barrier fence around the drum processing, tank storage, and still processing areas. These areas are all posted as warning and no smoking areas. Explosion proof pumps, motors, and lights are used to

minimize the chance of ignition.

As with the drum storage area, the two 4500 gallon storage tanks are located within the fifty foot buffer zone from the property line to the north. Again there are no buildings in the adjoining property for at least 50 yards. Dikes will be constructed to contain the volume of one of the 4500 gallon tanks so a spill to the adjoining property would be unlikely.

Special Requirements for Incompatible Wastes:

Since the facility does not handle incompatible waste, this section does not apply.

Tank Design Requirements:

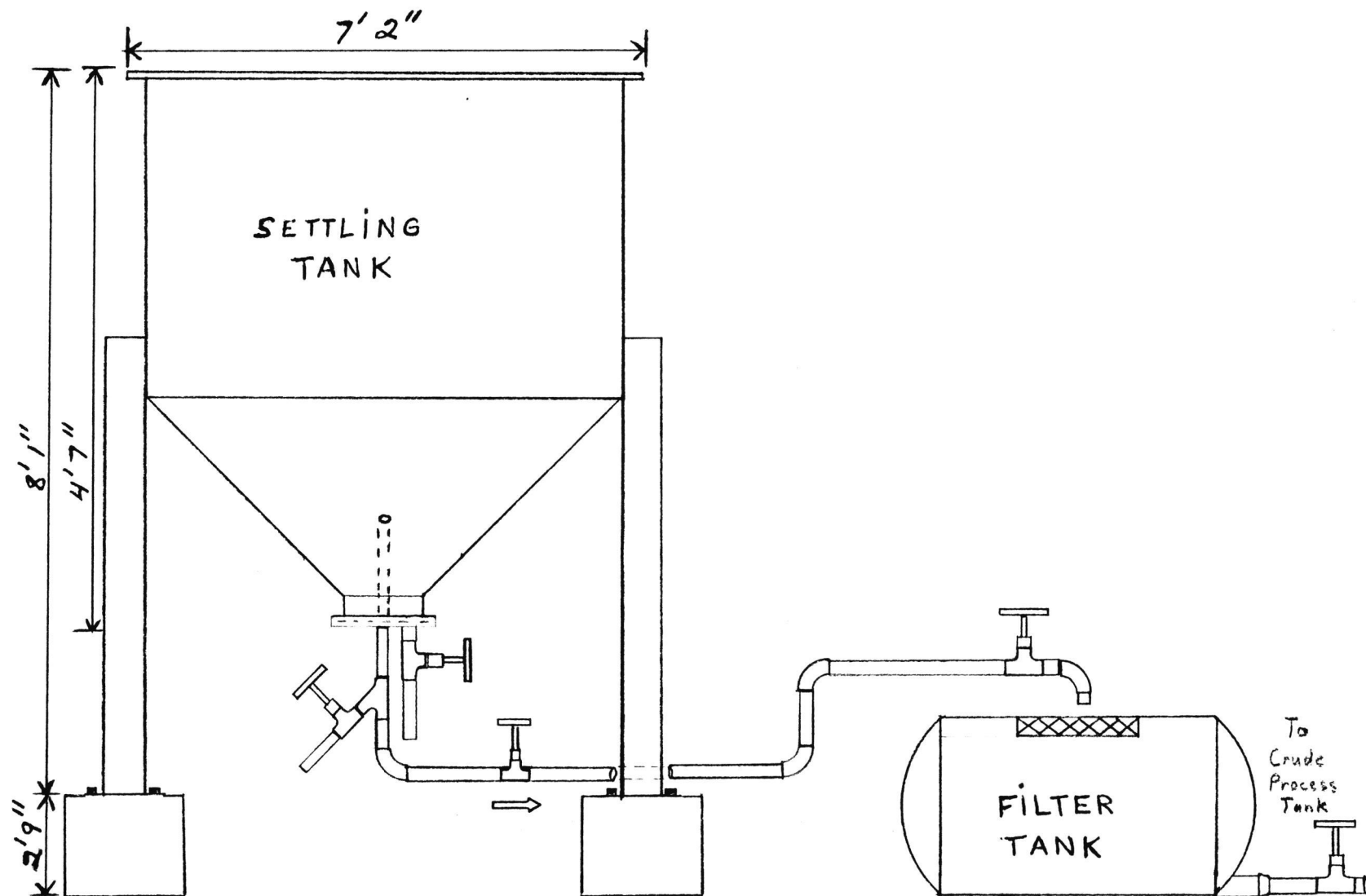
All that is available concerning design and construction of the tanks is what can be measured and observed, because the tanks were bought used and without technical drawings or specifications. See Figures 16-22 and Table 4. All the tanks are cold steel and unlined.

The tank dimensions and capacities are indicated in the drawings. The shell thickness of both the 4500 gallon storage tanks is .26 of an inch. Even though the exact thickness of each of the transfer and processing tanks has not been determined, none are less than an eighth of an inch.

The diagram of piping and process flow are provided in Figures 16-20 for the 4500 gallon bulk tanks, Figures 17 & 18 for the non-chlorinated solvent process, and Figure 19 & 20 for the chlorinated solvent process. The two 4500 gallon tanks, the 1000 gallon settling tank, the two transfer tanks, the 600 gallon chlorinated storage tank, and the chlorinated still feed tank

PIPING LAYOUT FOR SETTLING TANK TO FILTERING TANK

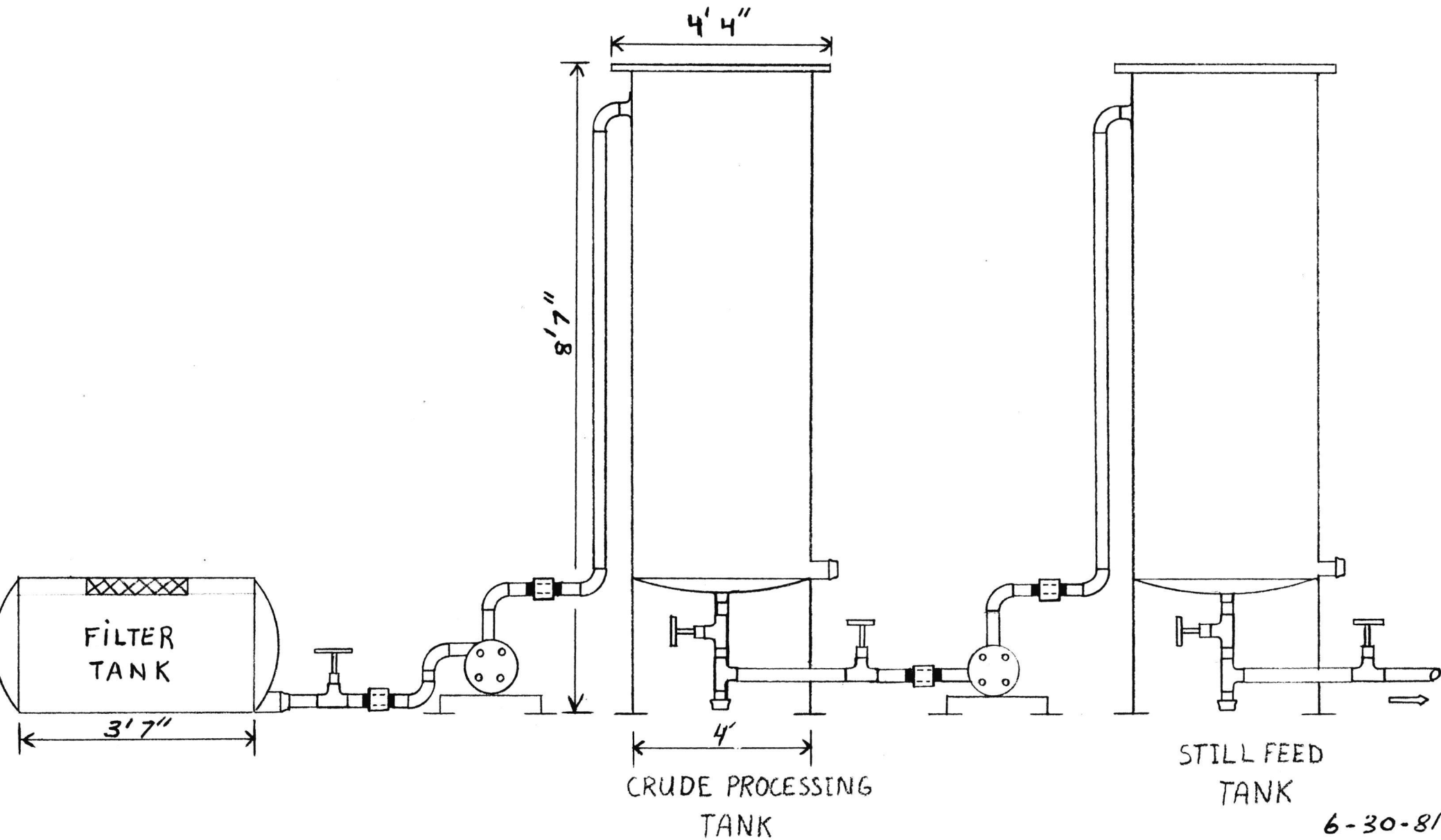
Figure 17



7-2-81
RAP

PIPING LAYOUT FOR FILTER TANK,
CRUDE PROCESS TANK, FEED TANK

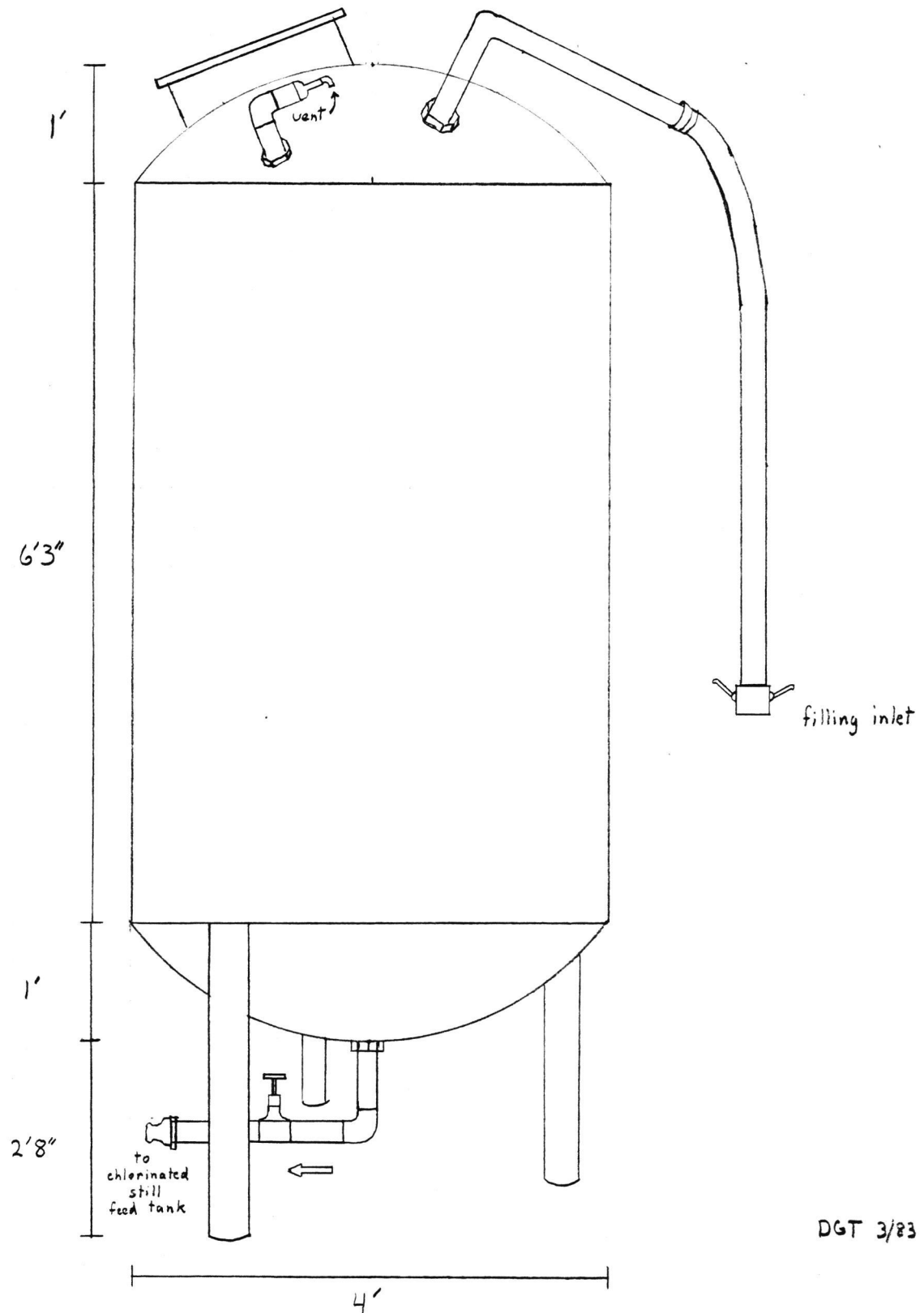
Figure 18



6-30-81
R.A.P.

Chlorinated
Storage
Tank

Figure 19



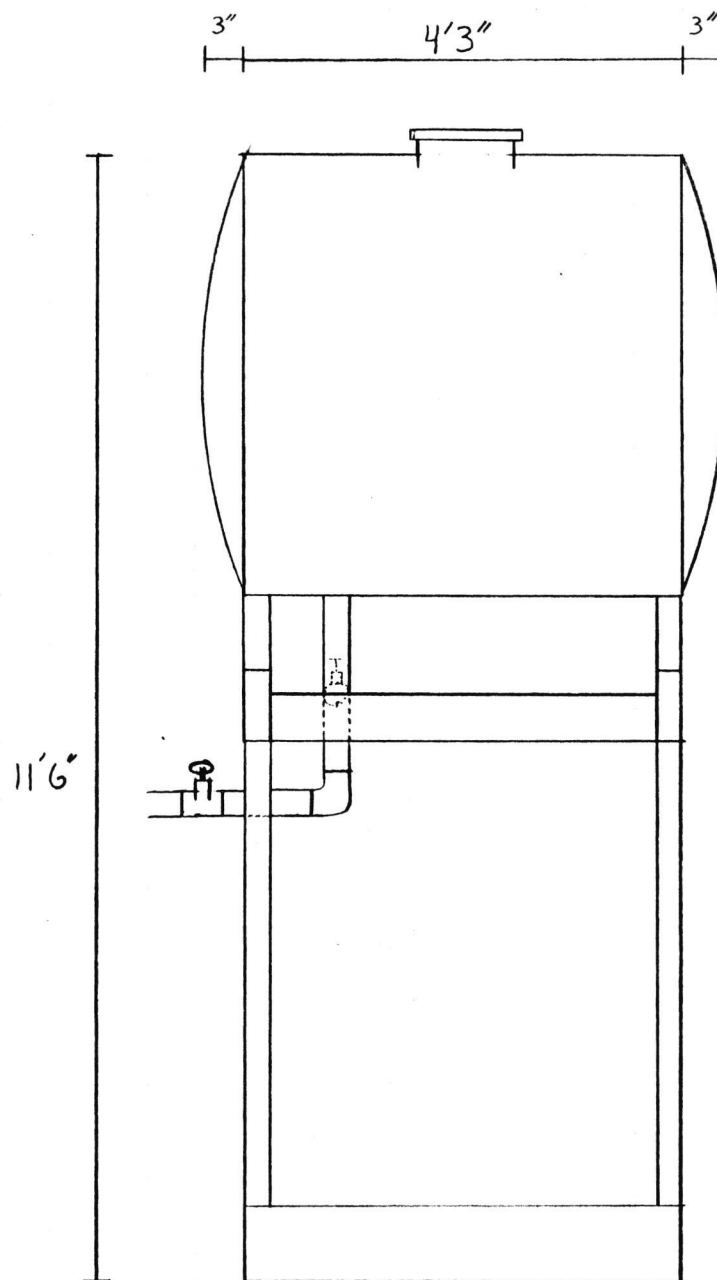
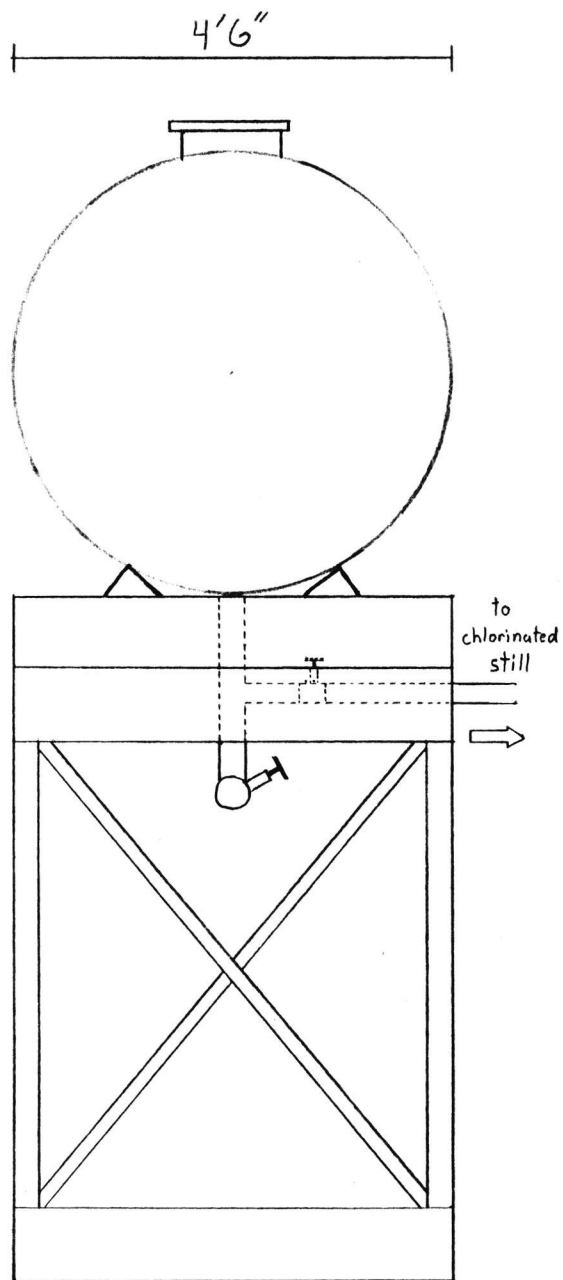


Figure 20

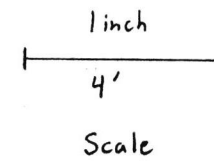
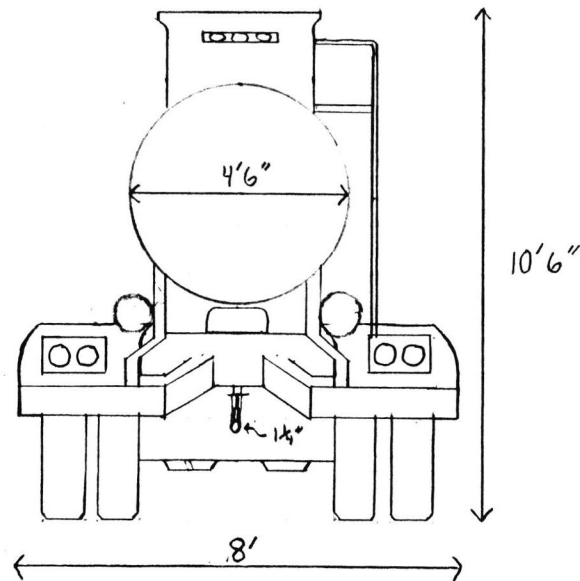
Chlorinated
Feed
Tank

DGT 3/83

Figure 21

3,000 Gallon

Transfer Tank



DGT 3/83

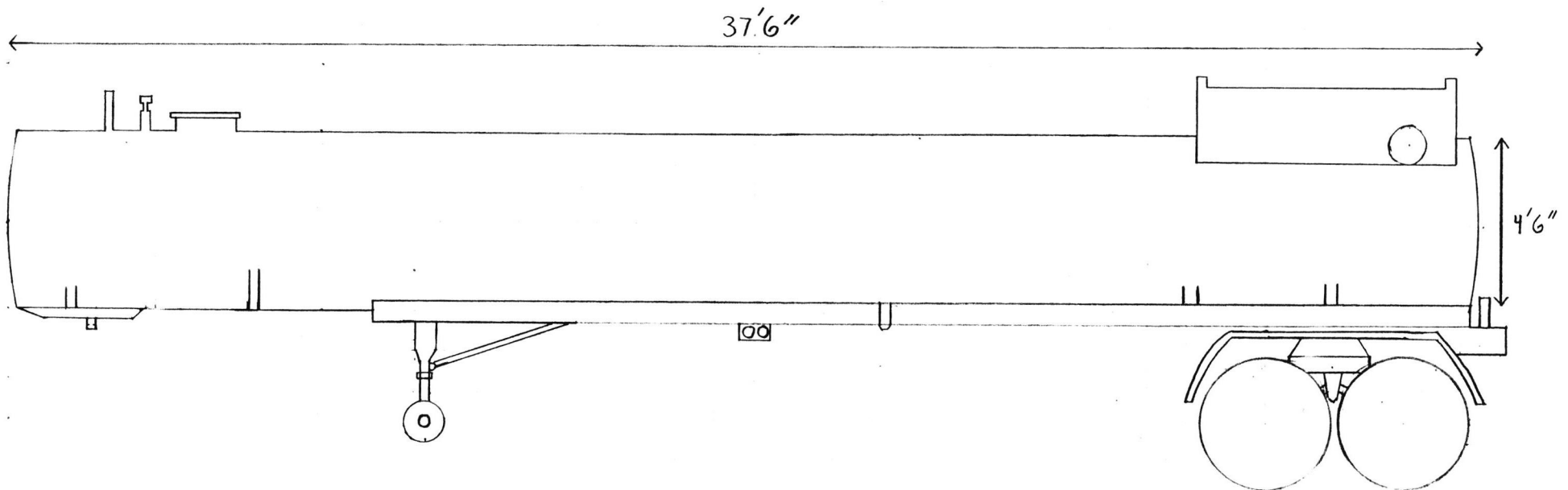
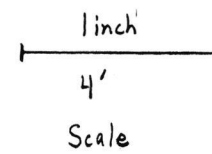


Figure 22

1200 Gallon

Transfer Tank



DGT 3/83

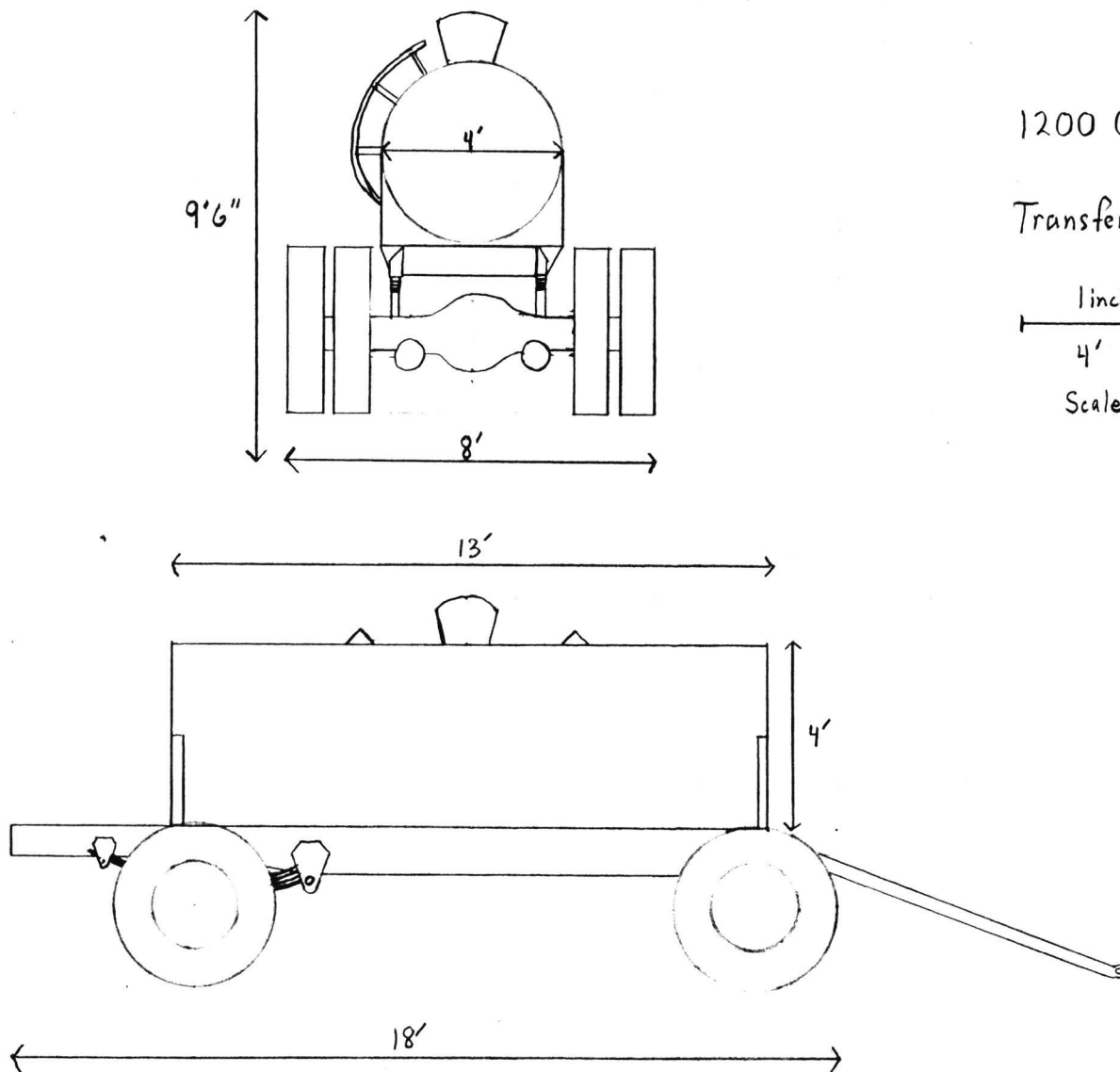


TABLE 4

Tank Dimensions and Capacities

<u>Tank Use</u>	<u>Vertical/Horizontal</u>	<u>Dimensions</u> (radius x length)	<u>Volume</u> (gallons)
Storage	V	3' x 21'	4500
Storage	V	3' x 21'	4500
Chlorinated Storage	V	2' x 6'3"	600
Settling	V	3'7" x 4'7"	1000
Filter (square tank)	H	2'7" x 3'7" x 1'6"	100
Crude Processing	V	2' x 8'7"	800
Still Feed	V	2' x 8'7"	800
Chlorinated Still Feed	H	2'3" x 4'3"	500
Transfer	H	2'3" x 37'6"	4000
Transfer	H	2' x 13'	1200

are all filled by pumping out of the transfer tanks or drums with a diaphragm pump. The tanks in sequence with the settling tank are filled by in-line gear pumps with explosion proof motors, and the still feed tank is emptied by the vacuum created by the still. The level detection devices and overflow pipes are described in the General Operating Requirements found in this part on Tanks. The tanks are vented to the atmosphere to handle any pressure differences.

The description of procedures for handling the ignitable wastes is covered in the section on General Requirements for Ignitable Wastes.

Dikes will be constructed of either masonry block filled with concrete or solid concrete around the two 4500 gallon tanks (Figure 16) and the processing tanks. This is to insure that major spills, if they should occur, will be contained. These dikes will be inspected according to the inspection schedule. The dike capacity for each will contain the volume of the largest tank.

9. SECURITY PROCEDURES
264.14 & 122.25(a)(4)

Barrier and Means to Control Entry: At present the still processing area (Figure 3) has an eight foot chain link fence surrounding it. The fence has two gates which are locked at the end of each working day. This insures that unauthorized personnel do not enter unless someone is on hand to be with them.

The tank storage, drum storage and drum processing areas are also surrounded by an eight foot chain link fence with gates that can be secured. However, since there are other industrial businesses renting buildings within this fenced area, it will be necessary to provide an additional barrier for these areas. To do this a six foot galvanized welded wire fence will be erected around the tanks and drum processing areas with a locking gate to allow access to equipment and personnel only when work is being done. The drum storage area, which is in the far west section of the designated Building C (Figure 3), will be locked when no one is working in it. A barrier partition will also separate the drum storage area from the rest of the warehouse.

Appropriate warning signs saying "Danger-Authorized Personnel Only" which are visible from 25 feet have been placed at each entrance and around the still processing area so that sufficient warning is given for each approach. The same warning signs have also been placed on the gate to Trombold Industrial Park, the drum storage warehouse, the fence adjacent to the tank storage and drum processing area, and future signs will be attached to the new barrier fence around the tank storage and drum processing area when it is built. These signs will be inspected to insure that they continue to be visible from 25 feet and are securely fastened. This is provided for in the inspection schedule.

10. INSPECTION SCHEDULE
AND LOG SHEETS 264.15 & 122.25 (a)(5)

A copy of the general inspection schedule is provided (Figure 24). The items inspected and the frequency of inspection were determined based upon the specific requirements in Sections 264.174, 264.194, 264.226, and 264.254. The schedule includes inspections of safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards. The schedule also identifies the problems which are to be looked for during the inspection.

Upon detecting any deterioration or malfunction of equipment or structures, remedial action will be taken by Reid Supply Company.

Reid Supply is also recording the regular inspection of the items listed on the inspection schedule. This is done in inspection log sheets (Figures 25-28) that are organized according to frequency of inspection. These records will be kept for three years from the date of inspection.

INSPECTION SCHEDULE

Figure 24

Area/Equipment	Specific Items	Types of Problems	Frequency of Inspection
Safety and emergency equipment	Fire Hydrant	Low Pressure	monthly (1st week)
	Portable Foam Unit	Not functioning	monthly (1st week)
	Fire Extinguishers	Charged and inspected by an official	monthly (1st week)
	Emergency Alarm	Does not sound	
	Two-Way Radio	Poor reception or name	
	Portable P.A. System	Poor volume	monthly
	Oil Absorbant	Inadequate supply at each processing area	weekly
	Empty Drums	Less than 80 drums available for spills, poor condition	weekly
	Air Compressor	Water accumulation, oil level	weekly
	Flexible Hoses & Quick couplings	Leaks, Smooth operation of couplings	weekly
	Emergency shower and eye wash	Water pressure leakage drainage	weekly
	Goggles	Impaired vision	weekly
	Organic Vapor Masks	Faulty straps, oil cartridges, cartridges good	monthly (1st week)
	Protective Clothing	Holes	monthly (1st week)
	Portable Sump Pump	Power, clogging	weekly
Security Devices	First Aid Kit	Missing items	monthly (1st week)
	Still Processing Area Fence	damage	weekly
	Drum Processing and Tank Storage, Area Fence	damage	weekly
	Warehouse Doors to Drum Storage	damage	weekly
	Gates	damage	weekly
	Locks	damaged	weekly
	Warning Signs	damaged	monthly (1st week)

INSPECTION SCHEDULE (continued)

Area/Equipment	Specific Items	Types of Problems	Frequency of Inspection
Operating and Structural Equipment	Portable Sump Pump	power, clogging	weekly
	Dikes	cracks, damage	weekly
	Bases, foundations	cracks, deterioration	weekly
	Piping to Holding Tanks	leaks, deterioration	weekly
Container Storage Area	Container Placement	Inadequate aisle space	weekly
	Sealing of Containers	Open lids	weekly
	Labeling of Containers	Incomplete information	weekly
	Containers	Corrosion, leakage, structural defects	weekly
	Pallets	Damaged	weekly
	Base of Foundation	Cracks, deterioration, wet spots	weekly
	Dikes	Cracks, damage	weekly
	Ramps	Stress fractures, warping	weekly
	Warning Signs	Damaged	weekly
	Dike	Cracks, deterioration	weekly
Tank Storage Area and Ancillary Equipment	Base of Foundation	Cracks, deterioration, wet spots	weekly
	Warning Sign	Damaged	weekly
	Pipes	Leaks, deterioration	weekly
	Valves	Leaks, deterioration	weekly
	Fittings	Leaks, deterioration	weekly
	Overfill prevention mechanisms	Clogging, leaks, alarm not activated	daily (each operating day)
Tanks	Ladders	Damaged, structural stability	weekly
	Structural Supports	Damaged, structural stability	weekly
	Pipe Connections	Leaks, deterioration	weekly
	Tank Shells (external)	Leaks, deterioration	weekly
	Tank Shells (internal)	Corrosion pits, sprung seams, rivets, depressions	yearly (June of each year)

DAILY INSPECTION LOG SHEET
OF OVERFILL PREVENTION MECHANISMS

Figure 25

Inspector's name/title _____

Possible Problems clogging, leaks, alarm not activating

DATE month/day/year	Status (X)		Observations	Date and Nature of Repairs/Remedial Action
	Acceptable	Unacceptable		

WEEKLY INSPECTION LOG SHEET

Inspector's name/title _____

Date of inspection _____ month/day/year

Time of inspection _____ (a.m. or p.m.)

Item	Possible Problems	Status (x)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Safety and Emergency Equipment					
Oil Absorbant	Inadequate supply at each processing area				
Empty Drums	Less than 80 drums available for tank leakage, poor condition				
Air Compressor	Water accumulation, oil level				
Flexible Hoses and Quick Couplings	Leaks, unsmooth operation of couplings				
Emergency Shower/Eye Wash	Water pressure, leakage				
Goggles	Impaired vision				
Portable Sump Pump	Power Clogging				
Security Devices					
Still Processing Area	damaged				
Drum Processing and Tank Storage Area Fence	damaged				
Warehouse Doors to Drum Storage Area	damaged, unlocked				
5 Gates	damaged				
5 Locks	damaged				

WEEKLY INSPECTION LOG SHEET (continued)

Inspector's Name/Title_____

Date of inspection_____ month/day/year

Time of inspection_____ (a.m. or p.m.)

Item	Possible Problems	Status (x)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Tank Storage Area					
Dikes	Cracks, deterioration				
Base or Foundation	Cracks, deterioration wet spots				
Sump Area	Cracks, deterioration, wet spots				
Warning Sign	Damaged				
Pipes	Leaks, deterioration				
Valves	Leaks, deterioration				
Fittings	Leaks, deterioration				
Tanks					
Ladders	Damaged, structural stability				
Structural Supports	Damaged, structural stability				
Pipe Connections	Leaks, deterioration				
Tank, Shells (external)	Leaks, deterioration				

WEEKLY INSPECTION LOG SHEET (continued)

Inspector's Name/title _____

Date of inspection _____ month/day/year

Time of inspection _____ (a.m. or p.m.)

Item	Possible Problems	Status (x)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Operating and Structural Equipment					
Portable Sump Pump	Power, clogging				
Dikes	Cracks, damage				
Bases, foundations	Cracks, deterioration				
Piping to holding tanks	Leaks, deterioration				
Container Storage Area					
Container Placement	Inadequate isle space				
Sealing of Containers	Open lids				
Labeling of Containers	Incomplete information				
Containers	Corrosion, leakage, structural defects				
Pallets	Damaged				
Sump Area	Cracks, deterioration, wet spots				
Base or Foundation	Cracks, deterioration, wet spots				
Dikes	Cracks, damage				
Ramps	Stress fractures, warping				
Warning Signs	Damaged				

MONTHLY INSPECTION LOG SHEET

Figure 27

Inspector's Name/Title_____

Date of inspection_____ month/day/year

Time of inspection_____ (a.m. or p.m.)

ITEM	Possible Problems	Status (X)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Fire Hydrant	Low Pressure				
Fire Hose	Leaks				
Portable Foam Unit	Not functioning				
Fire Extinguishers	Charged, present, currently inspected by fire inspector				
Emergency Alarm	Does not sound				
Portable P.A. System	Poor volume				
Organic Vapor Masks	Faulty straps, spent cartridges, rubber portion is deteriorating				
Protective Clothing	Holes or tears				
First Aid KIT	Missing items				
Warning Signs	Missing or damaged				

Figure 28

ANNUAL INSPECTION LOG SHEET
FOR INTERIOR OF TANK SHELLS

Inspector's name/title _____

Date of inspection _____ month/day/year

Time of inspection _____ (a.m. or p.m.)

ITEM	Possible Problems	Status (x)		Observations	Date and Nature of Repairs/Remedial Action
		Acceptable	Unacceptable		
Bulk Storage Tanks					
4500 gallons (A)	Corrosion pits, sprung seams, rivets, depressions				
4500 gallons (B)	Corrosion pits, sprung seams, rivets, depressions				
600 gallons	Corrosion pits, sprung seams, depressions				
Processing Tanks					
1000 gallons	Corrosion pits, sprung seams, rivets, depression				
750 gallons A	Corrosion pits, sprung seams, depressions				
750 gallons B	Corrosion pits, sprung seams, depressions				
500 gallons	Corrosion pits, sprung seams, depressions				
100 gallons	Corrosion pits, sprung seams, depressions				
Transfer Tanks					
3000 gallons	Corrosion pits, sprung seams, depressions				
1300 gallons	Corrosion pits, sprung seams, depressions				

11. PREPAREDNESS AND PREVENTION REQUIREMENTS 264, Subpart C

Required Equipment:

An emergency alarm will be installed in the still processing area and at the drum processing and tank storage area. These are the two areas where an emergency such as a fire could occur for which immediate warning would need to be sounded. The alarm switches will be readily accessible locations.

A hand-held two-way radio, capable of notifying the main office of the facility in the case of an emergency, will be required to be on hand whenever someone is on duty at the drum processing, drum storage, or tank storage areas. Personnel will be instructed to notify the emergency coordinator who can then alert the local emergency authorities. The still processing area is equipped with a telephone for direct communication with the emergency response team.

Portable fire extinguishers are located at the still processing, drum processing, tank storage, and drum storage areas to take care of small fires. The dikes around the tank and drum storage areas will contain major spills if they occur.

The drum processing, tank storage, and drum storage areas have access to a six inch diameter fire hydrant. Also to be acquired are larger fire extinguishers suitable for AB or ABC fires.

All of the above equipment will be inspected according to the inspection schedule (Figure 24).

As a general rule no employee of Reid Supply Company works alone. This is to insure that if there is an injury or emergency or both which

would incapacitate one of the workers, the other could get help. The workers would have the hand-held two-way radio to notify the office as stated earlier.

The facility maintains enough aisle space to allow the unobstructed movement of personnel, fire protection equipment and spill control equipment to any area of facility operation in an emergency.

Arrangements have been made to familiarize the Wichita Police, fire department, Emergency Medical Service, and Sedgwick County Civil Preparedness with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where personnel would normally be working, phone numbers where knowledgeable Reid Supply personnel can be reached during off-hours and possible evacuation routes. This information will be sent to each of the four agencies. Arrangements have also been made to notify St. Francis Hospital here in Wichita of the properties of hazardous waste handled at the facility and the types of injuries which could result from fires, explosions, or releases at Reid Supply.

All of the agencies contacted have been most appreciative and willing to help. In particular the Wichita Fire Department and Sedgwick County Civil Preparedness were eager to assist with the preparations for a potential emergency. The fire department offered to give instruction for fire extinguisher use to prevent small fires from getting large and to review Reid Supply's contingency plan in order to make helpful suggestions. Civil Preparedness told of their hazardous materials van which is equipped to facilitate the safe handling of hazardous waste spills. They also said in the event of an emergency that would be too difficult for the facility to handle they would be available for assistance and consultation. It is important to note that the Sedgwick County Fire Department, Wichita Fire

Department, Emergency Medical Services, and Civil Preparedness have organized a "Hazardous Materials Response Team" by which they can draw from each other's resources in the case of a hazardous waste emergency.

12. PREVENTIVE PROCEDURES 122.25(a)(8)

In order to prevent hazards in unloading hazardous waste drums, a special forklift attachment is used which is designed to handle one drum at a time without wedging the drum between two forks or otherwise damaging the drum. The drum handler, which conforms to the roundness of the drum, is adjustable for 30 gallon and 55 gallon steel drums. In addition to the forklift for unloading a truck, each of the three van trucks are equipped with hydraulic tail gates that permit drums to be brought down to ground level when a dock is not available as in the case of unloading drums in the still processing area. The forklift can also be used to unload trucks from ground level. When drums are unloaded at dock high level a suitable steel ramp is used to allow safe movement in and out of the truck. Whenever drums are transferred from one part of the plant to another the forklift or tailgate are used to load and unload the truck, but a truck is used to transport drums, not the forklift. This insures that the drum will not shake loose from the drum handler if it is used to transport drums.

In order to prevent hazards when using the two transfer tanks to bring waste solvent over to the still processing area, explosion proof pumps are used and the tanks are secured in position when loading and unloading.

In order to prevent runoff from the tank storage, drum storage and still processing areas, dikes will be constructed to contain potential spills. The still processing area and the drum storage area are both covered to prevent rain water run-on. This will be handled more fully in the discussion of secondary containment for containers and tanks. The contingency plan deals with the procedure in the case of a spill.

In order to prevent the contamination of water supplies, the dikes and overhead shelter mentioned earlier are provided. Again the procedures in case of a spill are covered in the contingency plan.

The inspection schedule (Figure 24) will help mitigate the occurrence and therefore the effects of equipment failure. The consequences of equipment and power failure are minimal and can be handled easily because of the simplicity of the operation. If a pump fails while filling a tank a valve can be closed to prevent any extensive backflushing. The liquid still in the hose can be transferred to an empty drum. If the forklift fails, the drum can be manually lowered safely to the ground.

In order to prevent undue exposure of personnel to hazardous waste, each employee who will be handling hazardous waste are supplied with protective goggles, solvent resistant gloves, and organic vapor mask. Further details are provided in Personnel Training.

13. REQUIREMENTS FOR IGNITABLE
WASTES 264.17, 264.36 & 122.25(a) (a)

Reid Supply Company does handle ignitable waste but not reactive or incompatible wastes. The list of ignitable wastes is given in Table 1. Since Reid Supply Company is familiar with handling virgin solvents of the same kind, i.e. xylene, methyl ethyl ketone, acetone, toluene and methanol, the hazardous waste solvents are handled in the same cautious way. These procedures used are in conformity with fire safety standards required by the fire insurance company.

To prevent the chance of ignition of these flammable waste solvents explosion proof lights are used in the still processing area, explosion proof pumps are used for all solvent transfers, and a drum opener with explosion proof motor is used. Proper grounding practices are used on the drums and tanks that contain flammable waste solvents in order to prevent dangerous static electricity build up. All drums are inspected weekly for loose bungs and leaks and the tanks are also inspected weekly for leaks that would be potential fire hazards. Drums in the drum storage area are stacked on pallets, one drum high, and spaced enough so possible leaks can be traced to individual drums. Sufficient aisle space is maintained so that each row of pallets can be reached by the forklift. The ignitable solvent drums are labeled with both a bright yellow Hazardous Waste Label and a red diamond Flammable Liquid sticker. The Flammable Liquid sticker distinguishes the ignitable waste drums from the other waste drums.

To further separate the ignitable wastes from sources of ignition smoking is confined to two break rooms which are isolated from the three areas of ignitable waste activity. "No Smoking" and "Danger-Authorized

Personnel Only" signs are placed around the still processing area, the drum processing and tank storage area, and the drum storage area.

From the practices and safeguards mentioned above, it can be seen that the facility does take precautions that prevent reactions which: generate extreme fire or explosions, produce uncontrolled flammable fumes or gas in sufficient quantities to threaten human health or the environment, produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions, damage the structural integrity of the device or facility, or through other like means threaten human health or the environment.

14. CONTINGENCY PLAN AND EMERGENCY

PROCEDURES, Part 264, Subpart D & 122.25(a)(7)

The following discussion provides the contingency plan and emergency procedures in case of spills, fires and explosions that might occur at the facility.

Spill Control:

If a drum springs a leak it will be necessary first to contain the leak by opening doors for ventilation, surrounding the drum with oil absorbant provided in each area, getting a pump to transfer the contents of the drum to a good drum, shoveling up the oil absorbant, and placing it in a 17 H drum for disposal. The emergency coordinator should be notified of the spill and cause of it.

If a larger leak occurs in the drum storage area, it will be necessary first to alert the emergency coordinator, put on an organic vapor mask, open up doors for better ventilation, squeegee the spill solvent into the sump, and pump the liquid into drums. The remaining solvent on the floor will be absorbed by oil absorbant and shoveled into a 17 H drum for disposal. The damage and leaking drums will be emptied as in the above paragraph and disposed of properly. The emergency coordinator will write up a report giving the date, time of incident, people involved, cause, extent of the spill, and any injury.

If a large leak occurs in a tank it will be necessary to notify the emergency coordinator. Suitable emergency clothing will need to be worn, such as an organic vapor mask, protective eye glasses, and solvent resistant

gloves. The leaking solvent will be collected in the secondary containment dike and then pumped into drums. The remaining solvent within the dike can be absorbed by oil absorbant and shoveled into a 17 H drum for disposal.

If a transfer tank begins to leak, a drum or other container will be placed under the leak and the contents pumped into empty drums or the other transfer tank.

Fire and Explosion Procedures:

Any small fires should be put out immediately by an available fire extinguisher. The incident should be reported at once to the emergency coordinator by the hand-held two-way radio and the fire department notified to come out at a "regular traffic speed". The person at the scene of the fire will stand with a fire extinguisher prepared for any possible fire outbreaks until the fire department arrives to inspect the scene. The emergency coordinator is to make a report giving the date, time of the incident, people involved, extent of damage, extent of remaining hazard if any, and the cause of the fire.

If a larger fire or an explosion occurs that cannot be controlled by a fire extinguisher, the emergency coordinator is to be notified immediately by the hand-held two-way radio. The emergency coordinator is to notify the fire department of the specific location of the fire at the facility as well as quantity and type of solvents involved.

The emergency coordinator will sound the alarm at the area to alert others of the fire. If the fire is not brought under control, the emergency coordinator is to evacuate the area within 100 yards of the fire using

the portable public address system. The evacuation will be done according to the evacuation plan that is detailed later. The emergency coordinator is to stay at a safe distance ready to give information to the firemen about the location and contents of the drums and tanks involved in the fire.

The fire department prefers that since they can reach the fire within four minutes, they want the fire hydrant available for their use rather than have Reid Supply use their own equipment.

If an emergency occurs at night where the fire department or police have been notified of the incident before the emergency coordinator, each has numbers where the emergency coordinator can be reached so that he can be on hand to direct the firemen or other emergency personnel.

Arrangements with Local Emergency Agencies:

Arrangements have been made with the Wichita Police, Wichita Fire Department, Emergency Medical Services, Civil Preparedness, and St. Francis Hospital. A packet of information is to be sent to each of them giving a map of the facility with locations of hazardous waste operations, evacuation routes, a list of hazardous waste handled at the facility, phone numbers where the primary emergency coordinator or back up emergency coordinator can be reached during off hours, and types of injuries that might occur. More detail is given in Section 11 on Preparedness and Prevention Requirements.

Name, Addresses, and Phone Numbers:

The primary emergency coordinator is Chuck Trombold, the Process Engineer. He was selected because of his knowledge of the hazardous

waste handling system and other facility operations, the facility's contingency plan, the location and characteristics of the waste handled, the location of all the hazardous waste records, the facility layout, and his availability should an incident occur. He has the responsibility for coordinating all emergency response measures. He can be reached during work hours at 267-5742, 267-5987, or 267-1231. During off hours he can be reached at [REDACTED]. The address for this number is [REDACTED] Ex. 6 PII

[REDACTED] Mike Shaw, the Plant Superintendent will be acting as assistant emergency coordinator, and can be reached at the above numbers during work hours. His home address and phone number will be provided when it is available after he moves into Wichita.

Emergency Equipment:

Foam unit - The foam unit for fighting fires, that may be acquired yet, would be used for fires that could not be controlled by a fire extinguisher in the still processing area.

Fire extinguishers - Fire extinguishers are located just inside the room at the base of the first verticle 4500 gallon bulk storage tank. Another is located in the drum storage area. Fire extinguishers are also located in the distillation processing area just inside the boiler room and just inside the still room. A fire extinguisher is located on each forklift. The use of the extinguishers is to be reviewed annually.

Emergency alarms - One emergency alarm is located in the still processing area and the other is located in the drum processing area.

These are activated by the emergency coordinator in the event of an emergency large enough to warn all people in the area, such as a fire.

Hand-held two-way radio - The hand-held two-way radio will accompany any personnel working in the drum storage, drum processing, or tank storage areas. This will facilitate communication with the emergency coordinator during an emergency.

First aid kit - One first aid kit is located in the washroom in Building I. Another is located in the breakroom just west of the drum processing area. The first aid kit contents are to be reviewed annually with each employee so that he is familiar with how each item can be used in an emergency.

Oil absorbant drums - Drums containing oil absorbant are located at each of the areas where hazardous waste is handled. The absorbant is used to prevent the spread of spills and to soak up spills that may cover a large area. Once it has absorbed liquid, it can be shoveled into a 17 H drum for disposal.

Empty drums - Empty drums are located in Building C and are kept on hand to hold waste solvent pumped into them in the case of a large spill. Eighty drums are kept on hand to contain the capacity of the larger transfer tank.

Portable public address system - The portable p.a. system, although not acquired yet, will be located in the emergency coordinator's office. This will enable him to announce instructions audibly during an emergency, such as when evacuation is necessary.

Air compressor, flexible hoses with quick couplings, and portable sump pump - These are located in D Building. They are to be used in

the case of a spill that is large enough to be pumped from the sump into emergency drums.

Emergency shower and eye wash - An emergency shower and eye wash are located in I Building and a shower is located in the washroom west of the drum processing area. These are to be used if a worker is sprayed by hazardous waste on the face, skin, or clothes.

Protective clothing, organic vapor masks, gloves and goggles - These are located in I Building to be used if there is a chance of breathing harmful vapors or hazardous waste coming in contact with skin.

All of these emergency items are inspected and maintained according to the inspection schedule (Figure 24).

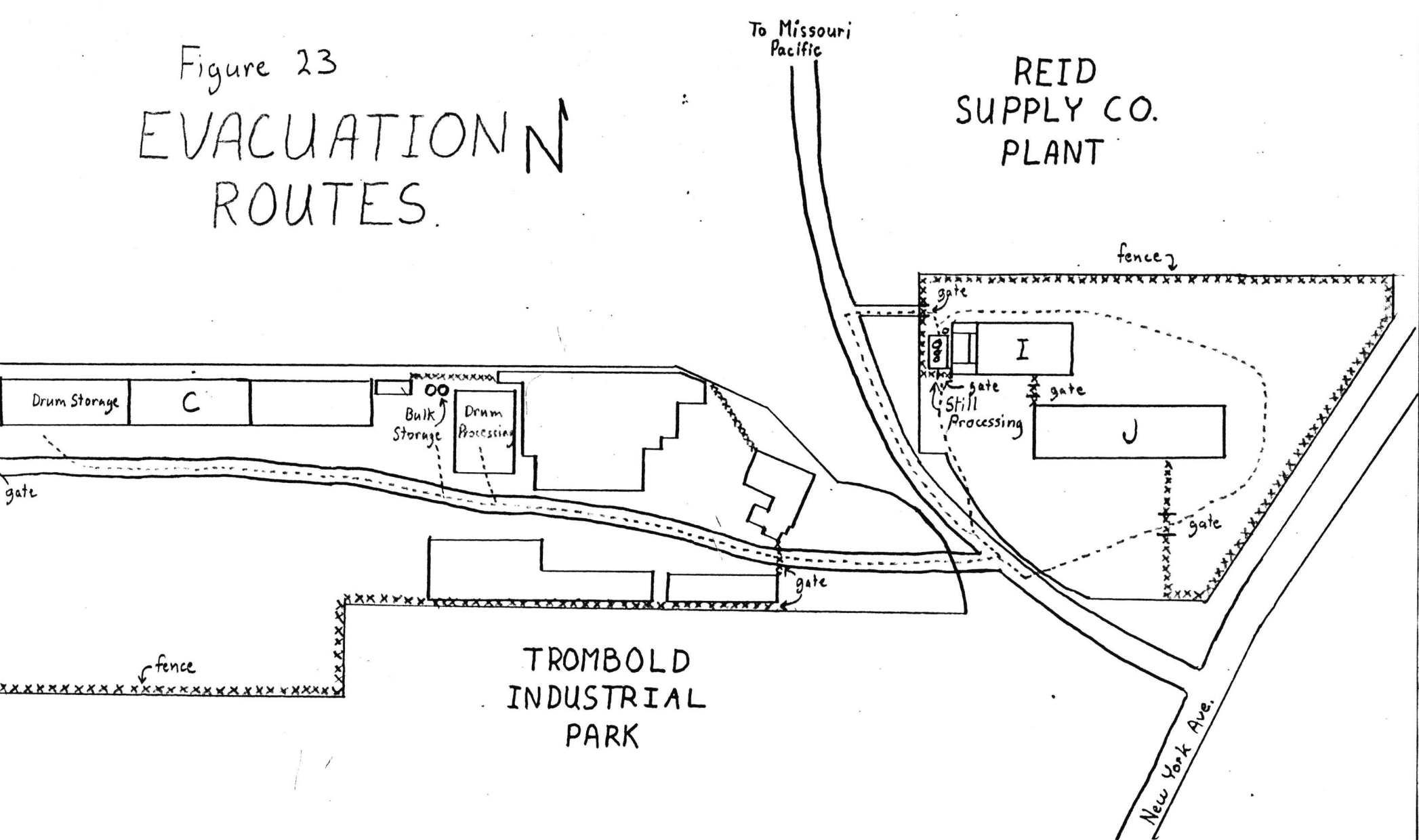
Evacuation Routes:

In case of fire in the drum storage area, bulk storage, or drum processing areas the evacuation route is along the road leading out of Trombold Industrial Park. (Figure 23) An alternate route would be through one of the doors along the north wall of C Building and around the north side of the property to the road leading to Missouri Pacific.

If there is a fire in the still processing area, three evacuation routes are available. (Figure 23) An exit can be made through the gate to the south of the still processing area. Another exit is the gate to the west of the area. The third route is to go around the north side of I Building around the east side of J Building, and out the gate just south of J Building.

Evacuation will be directed by the acting emergency coordinator through the use of the portable public address system. Once personnel have reached the area between the Reid Supply Company Plant and Trombold

Figure 23
EVACUATION
ROUTES.



120 feet
1 inch

Industrial Park, the emergency coordinator will direct them north toward Missouri Pacific or south down New York Avenue.

Responsibilities of the Emergency Coordinator:

Whenever there is a spill, fire, or explosion, the emergency coordinator must identify immediately the character, exact source, amount of aerial extent of any released materials. At the same time he is to assess possible hazard to human health or the environment that may result from the spill, fire, or explosion. This assessment must consider both direct and indirect effects of the incident. If the emergency coordinator determines that the incident could threaten human health, or the environment, outside the facility he must report his findings as follows:

- 1] If he determines that evacuation of local areas is advisable, he must notify Civil Preparedness to help them decide whether the evacuation should be done.
- 2] He must call the National Response Center at 1-800-424-8802.

The report must include:

- a) His name and phone number;
- b) Name and address of the facility;
- c) Time and type of incident;
- d) Name and quantity of material(s) involved;
- e) The extent of injuries, if any;
- f) The possible hazards to human health and environment outside the facility.

During an emergency, the emergency coordinator must take all

reasonable measures necessary to ensure that fires, explosions, and spills do not occur, reoccur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.

If the facility stops operations during such an incident the emergency coordinator must monitor for leaks or other related occurrences wherever this is appropriate.

After the emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil, or surface water, or any other material that results from such an incident at the facility.

The emergency coordinator must see that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

Responsibility of the Hazardous Waste Coordinator:

He is to notify the Region VII Administrator and the Kansas Department of Health and Environment in Topeka and Wichita that the facility has cleaned up all emergency equipment as stated above.

The Hazardous Waste Coordinator must note in his files the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Region VII Administrator. The report must include:

- 1] Name, address, and phone number of the Hazardous Waste Coordinator;

- 2] Name, address, and phone number of the facility;
- 3] Date, time and type of incident;
- 4] Name and quantity of the material(s) involved;
- 5] The extent of injuries;
- 6] The assessment of actual or potential hazards to human health or to the environment, where this is applicable; and
- 7] Estimated quantity and disposition of recovered material that resulted from the incident.

Emergency Phone Numbers:

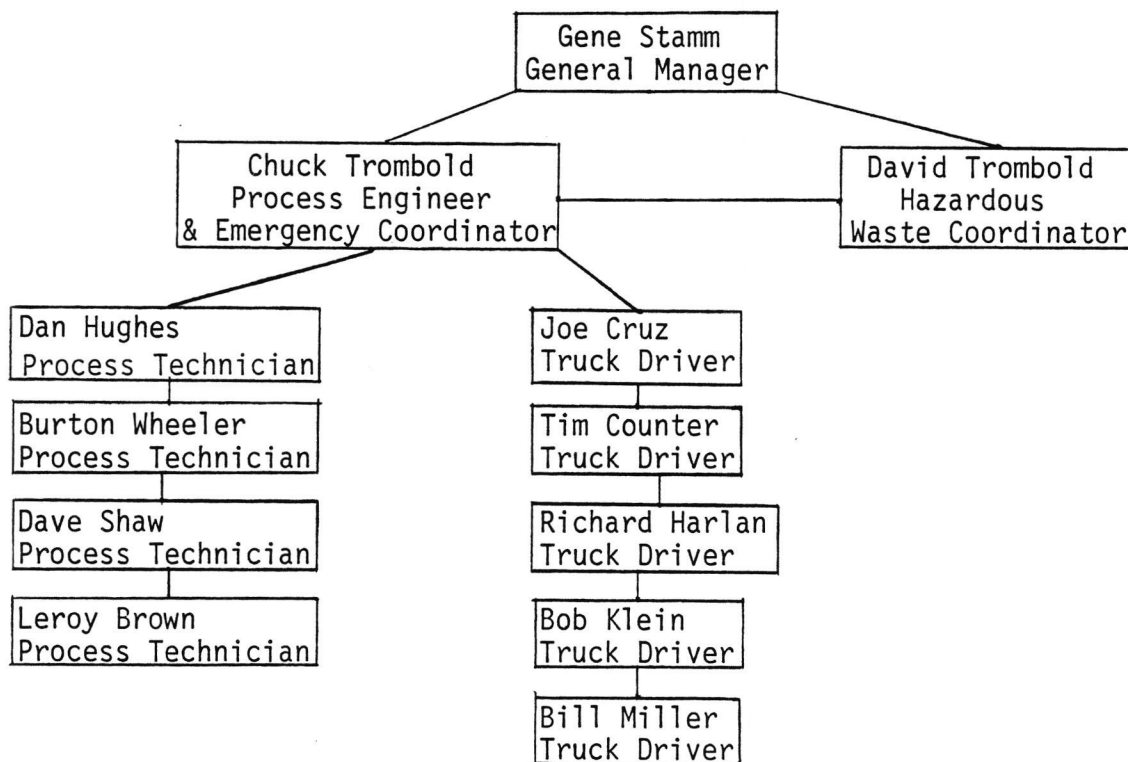
Emergency	Organization/Agency	Phone No.
Injury	Emergency Medical Services	911
Hazardous Waste Spill or Release	Civil Preparedness	911
Fire/Explosion	Wichita Fire Department	911

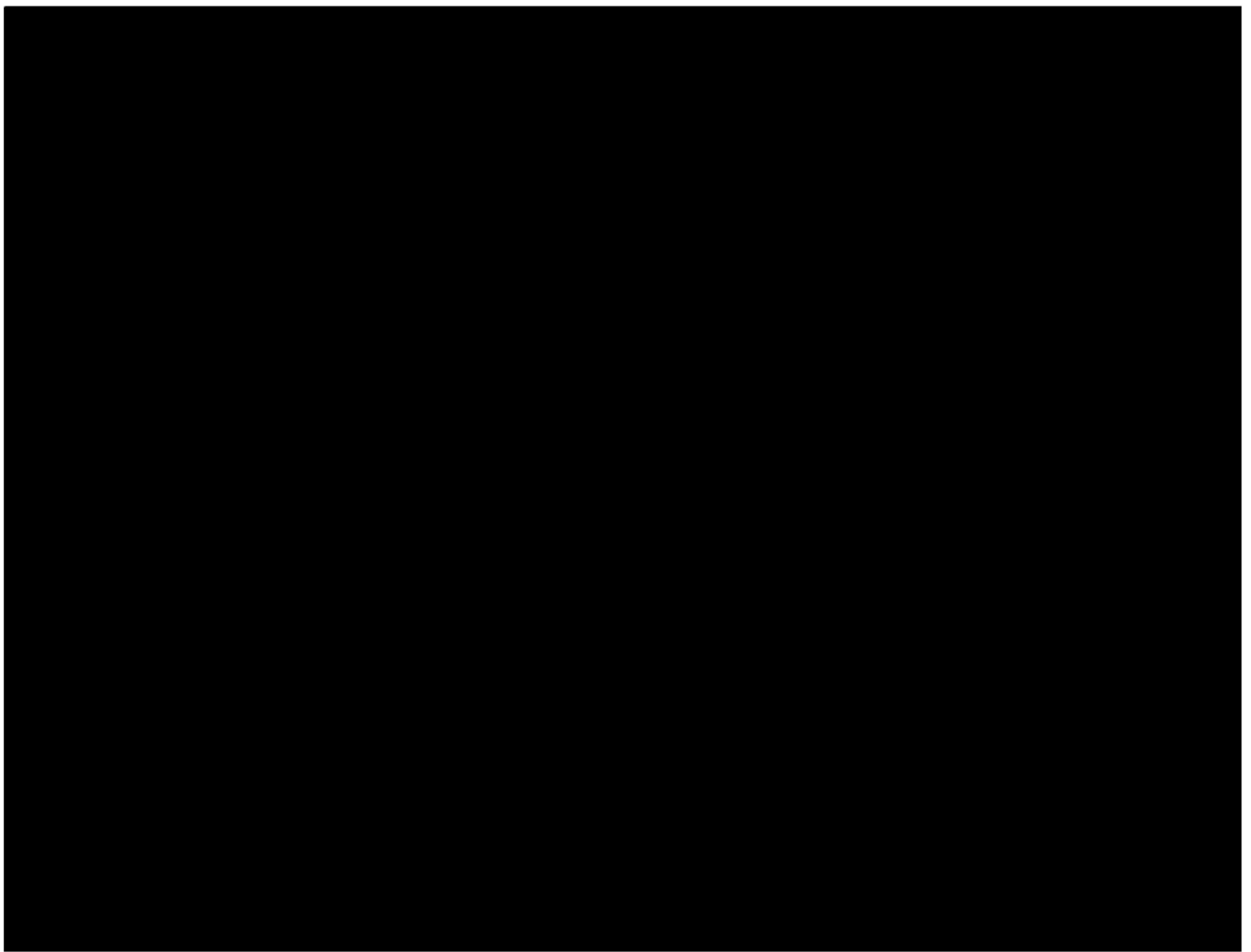
15. PERSONNEL TRAINING 264.16 & 122.25(a)(12)

The information contained in this section outlines the personnel training program for Reid Supply's hazardous waste storage facility.

Job Titles and Duties:

Figure shows the organization of personnel at the facility. Only five employees are directly involved with the handling of hazardous waste: The process engineer and four process technicians. The truck drivers handle hazardous waste to the extent that they transport drums of the waste. Management responsibilities involving compliance with RCRA regulations, but not involving actual handling of the wastes are shared between the hazardous waste coordinator and the process engineer.





Training Content, Frequency, and Technique: Ex. 6 PII

The program for Reid Supply Company personnel training for the handling of hazardous waste has been organized into a "training manual". This manual was written with the intent that it can be updated or revised in order to handle hazardous waste more safely. Each employee has his or her own copy of the manual. This training manual is kept on file at the facility and is available for official review.

During the training program, employees are instructed on:

- 1] The purpose of RCRA and the importance of maintaining compliance with RCRA regulations;

- 2] The hazardous nature of the wastes being stored in the facility;
- 3] Proper handling and storage procedures for wastes;
- 4] Emergency procedures and contingency plans.

The manual is used as the basis or framework for training Reid Supply Company personnel in the proper procedures, equipment, and systems to be used in managing hazardous wastes.

For key personnel, such as the hazardous waste coordinator and the process engineer, Reid Supply Company intends to further upgrade personnel training by sending them to pertinent seminars dealing with hazardous waste handling safety.

A summary of the content of the training manual is provided below:

Section 1 - Introduction

This section of the manual introduces Reid Supply Company employees to the Resource Conservation and Recovery Act (RCRA) and its authority for regulating hazardous wastes. The importance of this act is explored with reference to safety to the employee and the impact a complying HWM facility can have in protecting the environment from contamination by irresponsibility handled hazardous waste.

Section 2 - Facility and Process Description

This section focuses on the types of hazardous wastes that are handled and stored at the facility and normal/routine storage operations. A site diagram showing the dimensions, and relative position of each storage area (tanks and containers) is included. Training for normal

or routine operating conditions includes an explanation of the procedures for handling hazardous waste in drums and bulk in a safe manner.

Section 3 - Transportation of Hazardous Waste

This section focuses upon the responsibility of the truck drivers to see that proper labeling and manifesting has occurred before hazardous waste can be picked up from a customer. It also deals with their responsibility to see that all containers are without leaks.

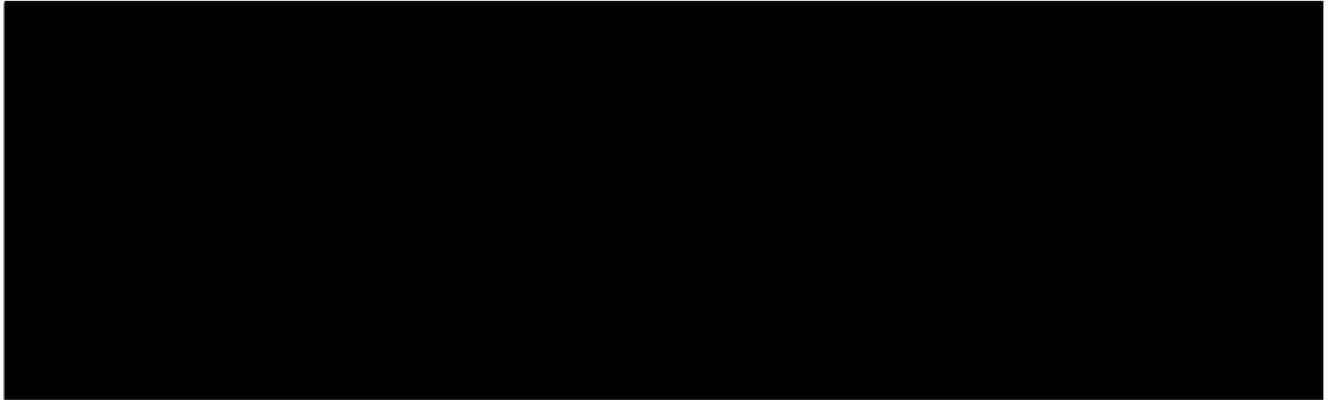
Section 4 - Contingency Plan and Emergency Procedures

The fourth section of the training manual provides detailed instruction on steps to be taken in the event of an emergency such as a waste spill or fire. The emergency coordinator is clearly identified as are emergency phone numbers, locations, and procedures for usage of emergency equipment. Contingency plans are also detailed.

This manual is used in classroom training for both introductory training and annual review. All personnel involved with hazardous waste are required to complete one hour of classroom training to go over the safety training manual in addition to one week on-the-job training before being able to work unsupervised. Also personnel receive monthly safety instructions that focus on a particular aspect of safety, such as fire fighting equipment use, first aid kit use, or contingency plan review. A one hour classroom session is used to review the training manual once a year. Safety awareness at the facility will be supplemented with information gained by the hazardous waste coordinator at seminars and conferences involving hazardous waste management.

Training Director:

The personnel training program is directed by David G. Trombold, the hazardous waste coordinator. He has been with Reid Supply since



at the facility in the past and the guidelines provided by 40 CFR and Ex. 6 PII other EPA literature have made it possible to develop a training program.

Relevance of Training to Job Position:

David G. Trombold, the hazardous waste coordinator, is responsible for teaching hazardous waste management procedures, including contingency plan implementation, to all waste handling personnel. The depth of training varies according to the position with the process engineer getting more than the process technicians or truck drivers. The hazardous waste coordinator oversees and does the in-class training, however, the process engineer supervises the on-the-job training and sees that the process technicians and truck drivers implement what they learn in the classroom.

The personnel training log figure provides a list of the areas of instruction to teach hazardous waste management procedures relevant to the process engineer, process technicians, and truck drivers. The process engineer, the process technicians and truck drivers receive

training in container handling, equipment operation, personal safety, emergency procedures, and contingency plans. The process engineer receives special instructions that relate to his responsibilities as emergency coordinator. His on-the-job training techniques are reviewed. The specifics are found in the personnel training log. The truck drivers receive training in what they should do if a drum began to leak after it had been picked up from a customer or what they should do in the event of a major spill.

Section 14, which deals with the contingency plan and emergency procedures, describes the procedures designed to ensure that the facility personnel are able to respond to emergencies. The personnel training log ensures that all areas of emergency procedures are covered during training of the personnel.

Implementation of the Training Program:

The facility personnel related to hazardous waste handling have at present been instructed in the procedures outlined above. And future new employees will be instructed within six months of their employment before they are allowed to work with the hazardous waste in unsupervised positions. Each of the facility personnel will have to take part in an annual review of the initial training required for each employee in hazardous waste handling.

Records are kept by the process engineer indicating the job title, job description, names of employees filling each job, and a written description of type and amount of both introductory and continuing training that will be given to each person filling a position related to hazardous waste management. The records also indicate which employees

have successfully completed what training. These records will be kept until the closure of the facility, and records for former employees will be kept only 3 years after they leave. See Figures 29 & 30 for training logs.

PERSONNEL TRAINING LOG

Name/Title _____

Date _____

ITEM	COVERED (X)	
<p>CLASS TRAINING</p> <p>Background & significance of RCRA</p> <p>Description of wastes managed</p> <p>Description of the storage facility</p> <p>Procedure for normal container handling</p> <p>Procedure for handling electroplating bath and sludge drums</p> <p>Procedure for normal bulk handling</p> <p>Checklist for transporting hazardous waste</p> <p>Emergency coordinator</p> <p>Emergency phone numbers</p> <p>Location, maintenance, inspection and use of emergency equipment</p> <p>Portable foam unit</p> <p>Fire extinguishers</p> <p>Firehose and fogger</p> <p>First Aid Kit</p> <p>Hand-held two-way radio</p> <p>Emergency empty drums</p> <p>Pumping equipment</p> <p>Emergency showers and eye wash</p> <p>Protective clothing</p> <p>Spill control for small drum leak</p> <p>Spill control for large drum leak</p> <p>Spill control for large tank leak</p> <p>Procedure for small fire</p> <p>Procedure for large fire</p> <p>Procedure for small explosion</p> <p>Procedure for large explosion</p> <p>Special truck driver training</p> <p>Check list for hazardous waste pickup</p> <p>Spill control for a drum leak while transporting</p> <p>Procedure for a major spill while transporting</p>		

PERSONNEL TRAINING LOG (continued)

Name/Title _____

Date _____

ITEM	COVERED (X)	
ON-THE-JOB-TRAINING		
Physical tour of facility		
Procedure for normal container handling		
Procedure for normal bulk handling		
Location and use of emergency equipment		
Portable foam unit		
Fire extinguishers		
Firehose and fogger		
First Aid Kit		
Hand-held two-way radio		
Emergency empty drums		
Pumping equipment		
Emergency shower and eye wash		
Protective clothing		
Spill control for small drum leak		
Spill control for large drum leak		
Spill control for large tank leak		
Procedure for small fire		
Procedure for large fire		
Procedure for small explosion		
Procedure for large explosion		

Figure 30

PERSONNEL TRAINING LOG
FOR EMERGENCY COORDINATOR AND BACK UP EMERGENCY COORDINATOR

Name _____

Date _____

ITEM	COVERED	
Responsibilities in case of a drum leak directing clean up write up report		
Responsibilities in case of a tank leak directing clean up write up report		
Responsibilities in case of a fire or explosion notify fire department coordinate portable foam unit operation sound the alarm use of fire hose and fogger initiate evacuation procedures inform fire about location and contents of drums and tanks write up report		

16. CLOSURE PLANS
Part 264, Subpart G & 122.25 (a)(13)

Closure:

Partial closure - The facility could be partially closed if one of the 4500 gallon storage tanks needed to be replaced or the still processing area needed to be upgraded. The tank and piping would be steam cleaned and the 450 gallons of water and hazardous residue from cleaning would be distilled to separate the residue for hazardous waste disposal.

The facility would also undergo partial closure in the event that a new reclaiming facility would be built. This would necessitate a total shut down of the storage and recycling operation to decontaminate all the tanks and drum storage area. But the solvents in the drums and tanks would not need to be disposed of. This partial closure would require scraping the drum storage area of any residual dried waste solvent and putting this into a 17 H drum. The tanks and pipes would be steam cleaned and the water and hazardous waste residue distilled in the facility still to separate the residue for hazardous waste disposal. The waste solvents in drums and tanks would be relocated at the new facility.

Final closure - This could occur if reclaiming was no longer feasible or if the company closed its doors. All of the drum material would have to be channeled through other TSD facilities as well as bulk storage material. 17 H drums containing flammable solid waste would go either to Atwood Enterprises in Norfolk, NE. or Chemical Reclamation Services in Ft. Worth, Texas. Reclamable and non-reclaimable chlorinated solvent drums

would go to Atwood Enterprises. All flammable liquids could go to Systech in Fredonia, Kansas.

In order to clean the tanks an oil field tank cleaning company would be contacted to steam the tanks and piping and collect the water and hazardous waste residue. The liquid could either be distilled in the facility still to concentrate the hazardous waste residue for disposal or if the still were not available, the liquid could be deep-well injected through Chemical Resources Incorporated in Tulsa, Oklahoma. The still could be scraped out and the scrappings disposed of in a 17 H drum just as the drums containing solid flammable waste.

Estimate of maximum inventory -

- 50 x 17 H drums of solid flammable waste
- 25 x 17 E drums of reclaimable chlorinated drums
- 10 x 17 E drums of non-reclaimable chlorinated solvent
- 290 x 17 E drums of waste flammable liquids
- 9000 gallons of waste flammable liquids in tanks

Decontamination - These steps are covered previously in the section on final closure.

Expected year of closure - This would be in 20 years, but since reclaiming is an ongoing process for Reid Supply, this figure is not certain. Closure could be accomplished in 180 days without disrupting the rest of the activity of the business. The facility could follow the schedule below:

- 1st 30 days - close down operation
- next 60 days- dispose of drum material
- next 30 days- dispose of tank material
- next 60 days - clean tanks, piping, and equipment

Amendment of closure estimate - The facility will amend its closure estimate according to the requirements of 264.112 (b).

Notification - The facility will notify the Region VII Administrator within 180 days prior to the projected beginning of closure.

Certification of closure - Upon completing closure the facility will submit to the Region VII Administrator certification by the owner and an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

Post closure plan - Reid Supply is not a disposal facility. Therefore post closure does not apply.

17. NOTICE TO LOCAL LAND AUTHORITY

264.119

Reid Supply Company is not a disposal facility. Therefore this section does not apply.

18. NOTICE IN DEED TO PROPERTY
264.120 & 122.25 (a) (14)

Reid Supply Company is not a disposal facility. Therefore this section does not apply.

19. CLOSURE COST ESTIMATE
AND FINANCIAL ASSURANCE DOCUMENT
122.25(a)(15) a64,142(a), 264.143, 264.112-115

Cost Estimate:

The cost estimate can be broken down into three main parts. They are hazardous waste disposal, tank and piping cleaning, and disposal of tank cleaning residue.

a] Hazardous waste disposal

17 H drums of solid flammable waste	50 drums x \$40.00 = \$2,000.
17 E drums of reclaimable chlorinated solvents	25 drums x 30.00 = 750.
17 E drums of non-reclaimable chlorinated solvent	10 drums x 75.00 = 750.
17 E drums of flammable liquid	290 drums x 55 gal. @ 20/gal. = 3,190.
Flammable liquid in tanks	9000 gallons x 20/gallon = 1,800.
	<hr/>
	TOTAL \$8,390.

b] Tank and piping cleaning

2 x 4500 gallons	2 x \$132 = \$264
1 x 4000 gallons	1 x 132 = 132
1 x 1200 gallons	1 x 35 = 35
1 x 1000 gallons	1 x 35 = 35
2 x 750 gallons	2 x 22 = 44
1 x 600 gallons	1 x 18 = 18
1 x 500 gallons	1 x 15 = 15
1 x 100 gallons	1 x 2 = 2
	<hr/>
	\$545
Additional expense	131
	<hr/>
Total	\$676

c] Disposal of tank cleaning residue

2 x 4500 gallons	2 x 450 gallons =	900 gallons
1 x 4000 gallons	1 x 400 gallons =	400 gallons
1 x 1200 gallons	1 x 120 gallons =	120 gallons
1 x 1000 gallons	1 x 100 gallons =	100 gallons
2 x 750 gallons	1 x 75 gallons =	150 gallons
1 x 600 gallons	1 x 60 gallons =	60 gallons
1 x 500 gallons	1 x 50 gallons =	50 gallons
1 x 100 gallons	1 x 10 gallons =	<u>10 gallons</u>
		1,790 gallons

@ .15/gallon deep well injection = \$268.50

Summary:

Hazardous waste disposal	\$8,390.00
Tank and piping cleaning	676.00
Disposal of tank cleaning residue	268.50
	<hr/>
Total	\$9,334.50

Closure financial assurance:

Reid Supply has chosen to acquire a closure letter of credit. This could have accompanied the application, but it would be better to have the closure cost estimate approved before drawing up the letter of credit. The letter of credit will be drawn up no later than May 1 since arrangements for closure financial assurance are required for Kansas TSD's at that time.

20. POST-CLOSURE COST ESTIMATE

Reid Supply is not a disposal facility. Therefore this section does not apply.

21. LIABILITY INSURANCE POLICY
SUDDEN AND ACCIDENTAL OCCURANCES -
PROPERTY AND BODILY INJURY
264.147(a)(1)

Sudden and Accidental Occurances:

To demonstrate Reid Supply's financial responsibility for claims resulting from sudden and accidental occurances that cause injury to persons or property a RCRA Certificate of Insurance has been obtained (Figure 31).

Non-Sudden Liability Insurance:

This does not apply to a storage facility that does not have a land fill or land treatment facility.



Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME AND ADDRESS OF AGENCY

W. G. MATCHETTE COMPANY
200 W. Douglas, Suite 150
Wichita, Kansas 67202

COMPANIES AFFORDING COVERAGES

COMPANY LETTER **A** Twin City Fire Insurance Company

COMPANY LETTER **B** AETNA CASUALTY & SURETY COMPANY

COMPANY LETTER **C**

COMPANY LETTER **D**

COMPANY LETTER **E**

NAME AND ADDRESS OF INSURED

REID SUPPLY COMPANY, INC.
911 E. Indianapolis, P.O. Box 11365
Wichita, Kansas 67202

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

COMPANY LETTER	TYPE OF INSURANCE	POLICY NUMBER	POLICY EXPIRATION DATE	Limits of Liability in Thousands (000)		
					EACH OCCURRENCE	AGGREGATE
B	GENERAL LIABILITY	[REDACTED] Ex. 4	10-10-83	BODILY INJURY	\$ 500,	\$ 500,
	PROPERTY DAMAGE			\$ 250,	\$ 250,	
	BODILY INJURY AND PROPERTY DAMAGE COMBINED			\$	\$	
	PERSONAL INJURY			\$500,		
	AUTOMOBILE LIABILITY			BODILY INJURY (EACH PERSON)	\$	
	<input type="checkbox"/> COMPREHENSIVE FORM			BODILY INJURY (EACH ACCIDENT)	\$	
	<input type="checkbox"/> OWNED			PROPERTY DAMAGE	\$	
	<input type="checkbox"/> HIRED			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	
	<input type="checkbox"/> NON-OWNED					
A	EXCESS LIABILITY	[REDACTED] Ex. 4	3-23-84	BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$ 2,000,	\$ 2,000,
	WORKERS' COMPENSATION and EMPLOYERS' LIABILITY			STATUTORY	\$	(EACH ACCIDENT)
	OTHER					

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES **Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.**

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail _____ days written notice to the below named certificate holder, but failure to mail such notice shall constitute no limitation of liability of or prejudice upon the company.
See Above

NAME AND ADDRESS OF CERTIFICATE HOLDER:

EPA
Region 7 Director
Kansas City, Missouri

DATE ISSUED: March 23, 1983

W. G. MATCHETTE COMPANY

Carroll Smith
AUTHORIZED REPRESENTATIVE

23. Manifest System, Recordkeeping, and
Reporting Part 264, Subpart E

Use of Manifest System:

When hazardous waste is accompanied by a manifest at Reid Supply Company, the process engineer signs and dates the manifest to certify that the hazardous waste covered by the manifest was received. He also inspects the manifest for any errors or discrepancies on each copy of the manifest. He then gives a copy of the signed manifest to the transporter if it is other than Reid Supply Company, and within 30 days sends the original copy back to the generator. At the facility he retains a copy of each manifest for at least three years from the date of delivery. If Reid Supply receives from a rail transporter, hazardous waste which is accompanied by a shipping paper containing all the information required on the manifest, the process engineer will sign and date each copy of the manifest or shipping paper to certify that the hazardous waste covered by the manifest or shipping paper was received. He will note any significant discrepancies on each copy of the manifest or shipping paper. He then will immediately give the rail transporter at least one copy of the manifest or shipping paper. Within 30 days after delivery he will send a copy of the signed and dated manifest to the generator. If the manifest has not been received in 30 days after delivery, the process engineer must send a copy of the shipping paper signed and dated to the generator, and retain at the facility a copy of the manifest and shipping paper for at least three years from the date of delivery.

Whenever a shipment of hazardous waste is initiated from Reid Supply the shipment will comply with the requirements of Part 262 of 40 CFR.

Manifest Discrepancies:

If there is a discrepancy with quantity or type of hazardous waste on the manifest, the process engineer is to attempt to reconcile the difference within 15 days after receiving the waste. If the discrepancy is not resolved in this time the process engineer is to submit to the Regional Administrator a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper.

Operating Record:

A written operating record will be kept at the facility until closure containing the following information:

- 1] Description of the quantity of each waste received for storage.
- 2] Location of each waste within the facility and the quantity at each location (for wastes accompanied by manifest numbers).
- 3] Records and results of waste analyses performed.
- 4] Summary reports and details of all incidents that require implementing the contingency plan.
- 5] Records and results of inspections.
- 6] Monitoring, testing, or analytical data.
- 7] Notices to generators.
- 8] Closure cost estimate.

Availability, Retention and Disposition of Records

Any representative of EPA who is designated by the Administrator is welcome to review Reid Supply's records relating to the above operating record. The three year retention period is automatically extended during an unresolved enforcement action or if the Administrator requests it. The facility will provide records of waste disposal locations and quantities

to the Regional Administrator and local land authority upon closure.

Reports:

Reid Supply has and will submit an annual report in accordance with 40 CFR 264.75.

The facility will also report: releases, fires, explosions, and closure.

Reid Supply will not receive unmanifested waste. If it does, the Regional Administrator will be notified within 15 days after receiving the waste.

Other Federal Laws:

We have no known interface or involvement with any of the laws referenced in 40 CFR Part 122.25(a)(20) and 122.12.

22. PROOF OF COVERAGE BY STATE
FINANCIAL MECHANISM 122.25 (a)(18)

This does not apply to Reid Supply Company.

24. ENGINEER CERTIFICATION
122.25

The design drawings of the large 4500 gallon storage tanks (Figure 16) and of the drum storage area (Figure 15) have been certified by a registered professional engineer, Elbert Deforest. The other tank drawings are not certified but do provide the reviewer with a visual idea of the other smaller tanks and their function.